

This California Privacy Statement is for California Residents only and supplements the Alliant Online and Mobile Privacy Statement and Alliant GLBA Privacy and Opt-Out Notice. This statement describes the Personal Information that Alliant Credit Union (“we,” “our,” or “us”) collects in the course of its business, explains how this information is collected, used, shared, and disclosed, describes rights provided by the California Consumer Privacy Act of 2018 (“CCPA”) to California Residents (“consumers” or “you”) regarding their Personal Information, and explains how consumers can exercise those rights.

Please note that, as a financial institution, most of the information we collect from you is exempt from disclosure because it is covered by or collected under the Gramm-Leach-Bliley Act, the Fair Credit Reporting Act, or other exemptions provided in the CCPA.

## What is Personal Information?

We may collect, use, share or disclose Personal Information. Personal Information is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household (“Personal Information”). “Personal Information” does not include: (1) publicly available information, such as information that is lawfully made available from federal, state, or local records, and (2) de-identified or aggregate consumer information. Under the CCPA, Sensitive Personal Information includes a consumer’s social security number, driver’s license, financial account or card number, precise geolocation, racial and ethnic characteristics, religious and philosophical beliefs, union membership, contents of mail, email and text messages and genetic and biometric data (“Sensitive Personal Information”).

With a limited exception, and as noted in other sections of this privacy statement, the CCPA does not apply to the following collectively referred to as exempt Personal Information:

- Certain Personal Information covered by or collected under industry-specific privacy laws including, but not limited to, the Health Insurance Portability and Accountability Act of 1996, the California Confidentiality of Medical Information Act, the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act, the California Financial Information Privacy Act, and the Driver’s Privacy Protection Act of 1994.

## Your Rights under the CCPA

As described in more detail below, the CCPA provides you with certain rights regarding the collection, use, retention, and disclosure of your Personal Information.

## Notice at Collection

### Personal Information We Collect, Use, or Disclose

The CCPA requires us to disclose certain information regarding our collection, use, and sharing of Personal Information. The following table outlines the categories of Personal Information that we have collected about consumers in the last 12 months. For each category, if applicable, we have identified the categories of sources from which that information was collected, the business or commercial purpose(s) for which the information was collected, and use, and the categories of third parties to whom we disclose Personal Information subject to other privacy law opt-out requirements. The criteria used to determine the period of time we will retain each category of Personal Information is driven by our records retention schedule in compliance with the numerous rules, laws and regulations governing financial institutions. We do not and will not sell Personal Information or share Personal Information with a third party for cross-context behavioral marketing. We do not use or disclose Sensitive Personal Information for purposes other than those permitted by the CCPA, such as to perform services or provide the goods reasonably expected by an average consumer. We do not collect biometric personal information, such as fingerprints, faceprints or voiceprints.

Categories of Personal Information About Consumers	The Categories of Sources from Which the Personal Information is Collected	The Business or Commercial Purpose(s) for Which the Information is Collected, or Shared	The Categories of Third Parties/Service Providers to Whom We Disclose Personal Information (provided other privacy law opt-outs do not apply)
<p><b>Identifiers.</b> This may include a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.</p>	<p>Consumers Including You, Members, Alliant's Employer Sponsors, Job Applicants, Employees, Contractors, Consumer Reporting Agencies, Collections Agencies, Service Providers, Government Agencies, Data Resellers, Internet Service Providers</p>	<p>Marketing, Underwriting, Loan or Account Servicing, Collection, Recovery, Responding to Your Requests for Information, Member Experience, Research, Fraud Prevention, Systems Monitoring and Performance, Authentication, Security, Regulatory Requirements, Data Analytics, Employment, Debugging, Membership, To Advance Our Commercial or Economic Interest Not Otherwise Identified Above</p>	<p>Loan or Account Servicing Contract Partners, Consumer Reporting Agencies, Other Financial Institutions, Marketing Firms, Data Analytics Firms, Government Entities, Operating System Providers, Joint Marketing Partners, Financial Aggregators</p>
<p><b>Personal information described in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e)).</b> This may include a 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.</p>	<p>Consumers Including You, Members, Alliant's Employer Sponsors, Job Applicants, Employees, Contractors, Consumer Reporting Agencies, Collections Agencies, Service Providers, Government Agencies, Data Resellers</p>	<p>Marketing, Underwriting, Loan or Account Servicing, Collection, Recovery, Responding to Your Requests for Information, Member Experience, Research, Fraud Prevention, Systems Monitoring and Performance, Authentication, Security, Regulatory Requirements, Data Analytics, Employment, Debugging, Membership, To Advance Our Commercial or Economic Interest Not Otherwise Identified Above</p>	<p>Loan or Account Servicing Contract Partners, Consumer Reporting Agencies, Other Financial Institutions, Marketing Firms, Data Analytics Firms, Government Entities, Operating System Providers, Joint Marketing Partners, Financial Aggregators</p>

Categories of Personal Information About Consumers	The Categories of Sources from Which the Personal Information is Collected	The Business or Commercial Purpose(s) for Which the Information is Collected or Shared	The Categories of Third Parties/Service Providers to Whom We Disclose Personal Information (provided other privacy law opt-outs do not apply)
<p><b>Characteristics of Protected Classification under California or Federal Law.</b> This may include age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth, and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</p>	<p>Consumers Including You, Members, Alliant’s Employer Sponsors, Job Applicants, Employees, Contractors, Consumer Reporting Agencies, Collections Agencies, Service Providers, Government Agencies, Data Resellers</p>	<p>Marketing, Underwriting, Loan or Account Servicing, Collection, Recovery, Responding to Your Requests for Information, Member Experience, Research, Fraud Prevention, Systems Monitoring and Performance, Authentication, Security, Regulatory Requirements, Data Analytics, Employment, Debugging, Membership, To Advance Our Commercial or Economic Interest Not Otherwise Identified Above</p>	<p>Loan or Account Servicing Contract Partners, Consumer Reporting Agencies, Other Financial Institutions, Marketing Firms, Data Analytics Firms, Government Entities, Operating System Providers, Joint Marketing Partners, Financial Aggregators</p>
<p><b>Commercial information.</b> This may include Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<p>Consumers Including You, Members, Consumer Reporting Agencies, Collections Agencies, Service Providers, Government Agencies, Data Resellers</p>	<p>Marketing, Underwriting, Loan or Account Servicing, Collection, Recovery, Responding to Your Requests for Information, Member Experience, Research, Fraud Prevention, Systems Monitoring and Performance, Authentication, Security, Regulatory Requirements, Data Analytics, Employment, Debugging, Membership, To Advance Our Commercial or Economic Interest Not Otherwise Identified Above</p>	<p>Loan or Account Servicing Contract Partners, Operating System Providers, Data Analytics Firms, Joint Marketing Partners, Consumer Reporting Agencies, Government Entities, Marketing Firms, Other Financial Institutions</p>

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<p><b>Biometric information.</b> This may include genetic, physiological, biological, or behavioral characteristics that can be used, singly or in combination with each other or with other identifying data, to establish your identity.</p>	<p>Consumers Including You, Members, Job Applicants, Employees, Contractors, Consumer Reporting Agencies, Collections Agencies, Service Providers, Data Resellers</p>	<p>Marketing, Loan or Account Servicing, Collection, Recovery, Responding to Your Requests for Information, Member Experience, Research, Fraud Prevention, Systems Monitoring and Performance, Authentication, Security, Regulatory Requirements, Data Analytics, Employment, Debugging, Membership, To Advance Our Commercial or Economic Interest Not Otherwise Identified Above</p>	<p>Loan or Account Servicing Contract Partners, Government Entities, Marketing Firms, Data Analytics Firms, Joint Marketing Partners, Operating Systems Providers</p>
<p><b>Internet or other similar network activity.</b> This may include browsing history, search history, or information on a consumer's interaction with a website, application, or advertisement.</p>	<p>Consumers Including You, Members, Employees, Contractors, Consumer Reporting Agencies, Collections Agencies, Service Providers, Data Resellers, Internet Service Providers</p>	<p>Marketing, Underwriting, Loan or Account Servicing, Collection, Recovery, Responding to Your Requests for Information, Member Experience, Research, Fraud Prevention, Systems Monitoring and Performance, Authentication, Security, Regulatory Requirements, Data Analytics, Employment, Debugging, Membership, To Advance Our Commercial or Economic Interest Not Otherwise Identified Above</p>	<p>Loan or Account Servicing Contract Partners, Marketing Firms, Data Analytics Firms, Social Networks, Government Entities, Other Financial Institutions, Joint Marketing Partners</p>

Categories of Personal Information About Consumers	The Categories of Sources from Which the Personal Information is Collected	The Business or Commercial Purpose(s) for Which the Information is Collected or Shared	The Categories of Third Parties/Service Providers to Whom We Share Personal Information (provided other privacy law opt-outs do not apply)
<p><b>Geolocation data.</b> This may include physical location or movements.</p>	<p>Consumers Including You, Members, Internet Service Providers, Mobile Service Providers, Collection Agencies, Employees, Contractors, Job Applicants, Service Providers, Alliant Employer Sponsors, Government Agencies, Data Resellers</p>	<p>Marketing, Underwriting, Loan or Account Servicing, Collection, Recovery, Responding to Your Requests for Information, Member Experience, Research, Fraud Prevention, Systems Monitoring and Performance, Authentication, Security, Regulatory Requirements, Data Analytics, Employment, Debugging, Membership, To Advance Our Commercial or Economic Interest Not Otherwise Identified Above</p>	<p>Loan or Account Servicing Contract Partners, Government Entities, Data Analytics Firms, Other Financial Institutions, Marketing Firms, Joint Marketing Partners, Operating Systems Providers</p>
<p><b>Sensory data.</b> This may include audio, electronic, visual, or similar information.</p>	<p>Consumers Including You, Members, Employees, Contractors, Job Applicants</p>	<p>Loan or Account Servicing, Responding to Your Requests for Information, Member Experience, Research, Fraud Prevention, Systems Monitoring and Performance, Authentication, Security, Regulatory Requirements, Data Analytics, Employment, Debugging, To Advance Our Commercial or Economic Interest Not Otherwise Identified Above</p>	<p>Loan or Account Servicing Contract Partners, Government Entities, Operating Systems Providers</p>

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<p><b>Professional or employment-related information.</b> This may include current or past job history or performance evaluations.</p>	<p>Consumers Including You, Members, Consumer Reporting Agencies, Service Providers, Data Resellers, Employees, Contractors, Job Applicants</p>	<p>Marketing, Underwriting, Loan or Account Servicing, Collection, Recovery, Responding to Your Requests for Information, Member Experience, Research, Fraud Prevention, Systems Monitoring and Performance, Authentication, Security, Regulatory Requirements, Data Analytics, Employment, Debugging, Membership, To Advance Our Commercial or Economic Interest Not Otherwise Identified Above</p>	<p>Loan or Account Servicing Contract Partners, Other Financial Institutions, Government Entities, Data Analytics Firms, Consumer Reporting Agencies, Marketing Firms, Operating Systems Providers</p>
<p><b>Inferences drawn from other personal information.</b> This may include information, data, assumptions, or conclusions derived from facts, evidence, or another source of information or data reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.</p>	<p>Data Resellers, Consumer Reporting Agencies, Employees, Contractors, Job Applicants, Government Entities, Service Providers, Mobile Service Providers, Members, Consumers Including You</p>	<p>Marketing, Underwriting, Loan or Account Servicing, Collection, Recovery, Responding to Your Requests for Information, Member Experience, Research, Fraud Prevention, Systems Monitoring and Performance, Authentication, Security, Regulatory Requirements, Data Analytics, Employment, Debugging, Membership, To Advance Our Commercial or Economic Interest Not Otherwise Identified Above</p>	<p>Loan or Account Servicing Contract Partners, Consumer Reporting Agencies, Data Analytics Firms, Marketing Firms, Government Entities, Other Financial Institutions, Operating Systems Providers</p>

Categories of Personal Information About Consumers	The Categories of Sources from Which the Personal Information is Collected	The Business or Commercial Purpose(s) for Which the Information is Collected or Shared	The Categories of Third Parties/Service Providers to Whom We Disclose Personal Information (provided other privacy law opt-outs do not apply)
<p><b>Sensitive Personal Information</b></p> <p>This may include personal information the unauthorized use or disclosure of which creates a heightened risk of harm to the consumer.</p>	<p>Consumers Including You, Members, Employees, Contractors, Job Applicants</p>	<p>Marketing, Underwriting, Loan or Account Servicing, Collection, Recovery, Responding to Your Requests for Information, Member Experience, Research, Fraud Prevention, Systems Monitoring and Performance, Authentication, Security, Regulatory Requirements, Data Analytics, Employment, Debugging, Membership, To Advance Our Commercial or Economic Interest Not Otherwise Identified Above</p>	<p>Loan or Account Servicing Contract Partners, Consumer Reporting Agencies, Other Financial Institutions, Marketing Firms, Data Analytics Firms, Government Entities, Operating System Providers, Joint Marketing Partners, Financial Aggregators</p>

### ***Disclosure of Personal Information***

In the preceding 12 months, we have disclosed Personal Information to third parties in order to carry out specific business or commercial purposes as described above. In the preceding 12 months, we have disclosed consumer Personal Information for business or commercial purposes to Service Providers and the following categories of third parties:

- Loan or Account Servicing Contract Partners
- Operating Systems Providers
- Government Entities
- Other Financial Institutions
- Marketing Firms
- Data Analytics Firms
- Joint Marketing Partners
- Social Media Networks
- Financial Aggregators
- Consumer Reporting Agencies

In the last 12 months, we have disclosed the following categories of Personal Information (as described in more detail above) for a business or commercial purpose as described above:

- Identifiers.
- Personal Information described in the California Customer Records Statute (see description above).
- Characteristics of Protected Classification under California or Federal Law.
- Commercial information.
- Internet or other similar network activity.
- Professional or employment-related information.
- Inferences drawn from other Personal Information.
- Sensitive Personal Information

### ***Sale of Personal Information***

In the preceding 12 months, we have not sold any Personal Information and have not shared any Personal Information with a third party for cross-context behavioral advertising. In addition, we do not and will not sell or share Personal Information in this manner. We do not target offers of goods or services directly to consumers under 16 years of age or sell or share the Personal Information of consumers under 16 years of age.

### ***Use of Sensitive Personal Information***

We do not use or disclose sensitive Personal Information for purposes other than those permitted by the CCPA, such as to perform services or provide the goods reasonably expected by an average consumer.

### **The Right to Know About Personal Information Collected, Used, or Disclosed**

You have the right to request that we provide you with certain information about your non-exempt Personal Information we collect, use, retain or disclose about you as well as the categories and specific pieces of information that we have collected about you in the 12 months before your submission of a verifiable consumer request to know. Specifically, you have the right to request the following information provided it is not exempt from the CCPA as discussed above:



- The categories of Personal Information we have collected about you.
- The categories of sources from which we have collected Personal Information about you.
- Our business or commercial purpose for collecting or sharing your Personal Information.
- Our business or commercial purpose for disclosing the category of Personal Information about you.
- The specific pieces of Personal Information we have about you.
- If we disclosed your Personal Information for a business purpose:
  - The categories of Personal Information that we disclosed about you for a business purpose; and
  - The categories of third parties to whom your Personal Information was disclosed for a business purpose, and which category of Personal Information was disclosed to that third party.

A household may request to know aggregate household Personal Information by submitting a verifiable consumer request to know. Also, if all consumers in a household jointly request access to specific pieces of information for the household, and we can individually verify all the members of the household, then we will comply with the request.

Only you (or an authorized agent) may make a verifiable consumer request to know about your Personal Information and you (or an authorized agent) may make a verifiable consumer request to know on behalf of your minor child.

However, there is certain information that we will not disclose to you. This information includes but is not limited to your 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, or security questions and answers. Also, we will not provide you with specific pieces of Personal Information if the disclosure creates a substantial, articulable, and unreasonable risk to the security of that Personal Information, your account with us, or the security of our systems or networks.

### **The Right to Request Deletion of Personal Information**

You have the right to request that we delete your non-exempt Personal Information that we have collected and maintained. A household may request the deletion of aggregate household, non-exempt Personal Information by submitting a verifiable consumer request. If all consumers in a household jointly request deletion of household, non-exempt Personal Information, and we can individually verify all the members of the household, then we will comply with the request.

Only you (or an authorized agent) may make a verifiable consumer request to delete for your Personal Information and you (or an authorized agent) may make a verifiable consumer request on behalf of your minor child.

### **The Right to Request Correction of Inaccurate Personal Information**

You have the right to request that we correct your inaccurate non-exempt Personal Information that we have collected and maintained. A household may request the correction of aggregate inaccurate household, non-exempt Personal Information by submitting a verifiable consumer request. If all consumers in a household jointly request correction of inaccurate household, non-exempt Personal Information, and we can individually verify all the members of the household, then we will comply with the request.

Only you (or an authorized agent) may make a verifiable consumer request to correct your inaccurate non-exempt Personal Information and you (or an authorized agent) may make a verifiable consumer request on behalf of your minor child.

We will consider the totality of the circumstances relating to the contested non-exempt Personal Information and if it is determined that based on that analysis the contested Personal Information is more likely than not to be accurate, we may deny your request to correct your Personal Information. We may delete the contested Personal Information as an alternative to correcting your information if the deletion of the Personal Information does not negatively impact you, or if you consent to the deletion.

## **Instructions for Submitting a Verifiable Request to Know, to Delete or to Correct Your Personal Information Collected, Used, or Disclosed**

To exercise your Right to Know, to Delete, or to Correct please submit to us a verifiable consumer request to know by either:

- Visiting [www.alliantcreditunion.org/ccpa-request-form](http://www.alliantcreditunion.org/ccpa-request-form). When visiting [www.alliantcreditunion.org/ccpa-request-form](http://www.alliantcreditunion.org/ccpa-request-form), complete all required fields and click the submit button.
- Calling us at 800-328-1935. When calling us, inform the call center agent that you are calling to submit a California Consumer Privacy Act (CCPA) request and provide the information requested by the agent for identity verification purposes.

You may designate an authorized agent to make a request on your behalf using the same process above. If you would like to use an authorized agent, which is an individual or business registered with the Secretary of State that you have authorized to act on your behalf, to submit a CCPA request, you must provide the authorized agent with written permission to do so and verify your own identity directly with us. We may deny a request from an agent that does not submit proof that they are authorized to act on your behalf.

Only you (or an authorized agent) may make a verifiable consumer request related to your Personal Information and you (or an authorized agent) may make a verifiable consumer request on behalf of your minor child.

Please note that we are only required to respond to your CCPA request twice within a 12-month period.

Please note that we may deny your CCPA request for a number of different reasons, including for the reasons identified above in the "What is Personal Information" section and in the CCPA.

## **The Process We Use to Verify Your Request to Know, to Delete or to Correct Your Personal Information Collected, Used, or Disclosed**

- **Members or Password-Protected Accounts:** If you are our member or have a password-protected account with us, we may verify your identity through our existing authentication practices for your account. We will also require you to re-authenticate yourself before we disclose, delete or correct your Personal Information. If we suspect fraudulent or malicious activity related to your account, we will not comply with your request until we perform further verification to determine whether your request is authentic and you are the person we have collected the Personal Information from.
- **Non-Members or Non-Account Holders:** If you are not a member or do not hold a password-protected account with us, we will verify you as follows:
  - If you submit a request to know the categories of Personal Information, you will need to provide us with your name, address, date of birth, and Social Security number, which we will process through a third party identity verification service to verify your identity.
  - If you submit a request to know specific pieces of Personal Information, or to delete or to correct your Personal Information, you will need to provide us with your name, address, date of birth, and Social Security Number, which we will process through a third party identity verification service to verify your identity. You will also be required to submit a signed declaration under penalty of perjury stating that you are the consumer whose Personal Information is requested.

We will generally avoid requesting any additional information from you to verify you. However, if we or the third party identification service cannot verify your identity based on the information we or the third party identification service currently maintain, we may request additional information from you, which will only be used to verify your identity and for security or fraud prevention purposes. We will delete any new Personal Information we collect to verify your identity as soon as practical after processing your request unless otherwise required by the CCPA or other applicable law.

Generally, if we are unable to verify your identity, we will inform you and explain why we were unable to do so.

## **Our Response to Your Request to Know, to Delete or to Correct Your Personal Information Collected, Used, or Disclosed**

Once we receive your verifiable consumer request, we will confirm our receipt of your request within 10 business days and provide you with additional information about how we will process the request. Our goal is to respond to your request within 45 calendar days of receiving the request, beginning on the day we receive the request. However, in the event that we need more time (up to 90 calendar days total) to respond to your request, we will provide you with notice and an explanation of the reasons that we will take more than 45 calendar days to respond. Any disclosures we provide will cover the 12-month period preceding our receipt of your request. If we are unable to comply with a given request, we will provide you with a response explaining why we have not acted on your request and identifying any rights you may have to appeal the decision.

We will not charge you to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request. We may refuse to act on your CCPA request if, for example, it is unfounded or excessive, if we cannot verify your identity or the authority of your agent, or because of a conflict with federal or state law, and if so, we will let you know.

### **Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights, including an employee's, applicant's, or independent contractor's rights not to be retaliated against. For example, unless otherwise permitted by the CCPA, we will not:

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

### **Date Our California Privacy Statement was Last Updated**

This California Privacy Statement was last updated on 12/31/2022.

### **Contacting Us**

If you have any questions regarding our privacy policies, our California Privacy Statement, the ways in which we collect, use, and disclose your Personal Information, or how to exercise your rights under the CCPA, please do not hesitate to contact us at:

Website: [www.alliantcreditunion.org/ccpa-request-form](http://www.alliantcreditunion.org/ccpa-request-form)

Email: [privacy@alliantcreditunion.com](mailto:privacy@alliantcreditunion.com)

Phone: 800-328-1935