



# CCPA DISCLOSURE

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Your privacy is important to us. This California Consumer Privacy Act Disclosure (“CCPA Disclosure” or “Disclosure”) explains how we collect, share, use, and protect your personal information through your online and offline interactions with us. The rights outlined in this form are applicable to California residents.

## I. CATEGORIES OF INFORMATION WE COLLECT

In the preceding 12-months, we have collected the following categories of personal information (please note that some categories overlap):

Category	Examples
A. Identifiers	A real name or alias; postal address; signature; home phone number or mobile phone number; membership number, credit card number, debit card number, or other financial information; physical characteristics or description; email address; account name; Social Security number; driver's license number or state identification card number; passport number; or other similar identifiers.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	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. Some personal information included in this category may overlap with other categories.
C. Protected classification characteristics under state or federal law	Age (40 years or older), 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).

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 similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
F. Geolocation data	Physical location or movements. For example, city, state, country, and ZIP code associated with your IP address or derived through Wi-Fi triangulation; and, with your permission in accordance with your mobile device settings, and precise geolocation information from GPS-based functionality on your mobile devices.
G. Professional or employment-related information	Current or past job history, performance evaluations, disciplinary records, workplace injury records, disability accommodations, and complaint records.
H. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Educational records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.

Personal information for purposes of the CCPA does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
  - o health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - o personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from consumers or their agents. For example, from documents that consumers provide to us related to the services for which they engage us.
- Indirectly from consumers or their agents. For example, through information we collect from consumers in the course of providing services to them.

- Directly and indirectly from activity on our website (**patelco.org**) or our Mobile App. For example, from submissions through our website portal or website usage details collected automatically.
- From third-parties that interact with us in connection with the services we perform including to provide marketing materials.

## **II. HOW WE USE YOUR PERSONAL INFORMATION**

We may use or disclose personal information we collect for one or more of the following operational or other notified purpose (“business purpose”):

- To fulfill or meet the reason for which the information is provided. For example, you apply for a loan, and we use the information in your loan application to give you the loan.
- To provide you with information, products or services that you request from us.
- To provide you with email alerts, event registrations or other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our website and present its contents to you.
- For testing, research, analysis to improve our products and services and for developing new ones.
- To protect the rights, property or safety of us, our employees, our members or others.
- To detect security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, in which personal information held by us is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

## **III. SHARING PERSONAL INFORMATION**

We disclose your personal information to a third party for a business purpose or commercial purpose. When we disclose personal information for a business or commercial purpose, we enter a contract that describes the purpose and requires the recipient to keep that personal information confidential and not to use it for any purpose except performing the contract.

In the preceding 12-months, we have disclosed the following categories of personal information for a business or commercial purpose:

Category A: Identifiers

Category B: California Customer Records personal information categories

Category C: Protected classification characteristics under California or federal law

Category D: Commercial information

Category F: Internet or other similar network activity

Category G: Geolocation data

Category H: Professional or employment-related information

Category I: Non-public education information

We disclose your personal information for a business or commercial purpose to the following categories of third-parties:

- Our third-party service providers;
- Our affiliated websites and businesses in an effort to bring you improved service across our family of products and services, when permissible under relevant laws and regulations;
- Other companies to bring you co-branded services, products or programs;
- Third parties that help us advertise, products, services or membership with us to you;
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you; and
- Other third parties to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights, or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third parties.

#### **IV. SELLING PERSONAL INFORMATION**

We do not sell your personal information for monetary consideration. However, there may be instances where we disclose or share your information with a third party for other considerations.

#### **V. YOUR RIGHTS AND CHOICES**

This section describes your rights and choices regarding how we collect, share, use, and protect your personal information, how to exercise those rights, and limits and exceptions to your rights and choices.

### **a. Exceptions**

We will first address the exceptions where your rights and choices in this Section V do not apply to you:

- If you are not a California resident.
- If we collected personal information covered by certain financial sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994. How we collect, share, use and protect your personal information covered under the GLBA.
- "Aggregated information" that relates to a group or category of consumers, from which consumer identities have been removed, that is not linked or reasonably linkable to any consumer or household, including via a device.
- "Deidentified information" that cannot reasonably identify, relate to, describe, be capable of being associated with, or be linked, directly or indirectly, to you, provided that we have: (i) implemented technical safeguards that prohibit reidentification of your information; (ii) implemented business processes that specifically prohibit reidentification of the information; (iii) have business processes to prevent inadvertent release of deidentified information; and (iv) make no attempt to reidentify the information.
- The information we have is publicly available from government records.

### **b. Access to Specific Information and Data Portability Rights**

If the above exceptions do not apply, and you have not made this request more than twice in a 12-month period, you have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months from the date we receive your request. Once we receive and confirm your request and verify that the request is coming from you or someone authorized to make the request on your behalf, we will disclose to you or your representative:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties to whom we disclosed the category of personal information for a business or commercial purpose.
- The business or commercial purpose for which we disclosed the category of personal information.
- The specific pieces of personal information we collected about you in a form that you can take with you (also called a "data portability request").

### **c. Deletion Request Rights**

You have the right to request that we delete any of your personal information that we collect from you and retained, subject to certain exceptions. Once we receive and verify your request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies. We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
3. Debug to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
5. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the businesses' deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you previously provided informed consent.
6. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
7. Comply with a legal obligation.
8. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### **d. Exercising Access, Data Portability, and Deletion Rights**

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either calling 800.358.8228 or submitting a request online. To submit a request online, visit [patelco.org/privacy](https://patelco.org/privacy) and then scroll to the **California Consumer Privacy Act (CCPA)** paragraph. Then, select the link to submit a request.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

When we receive a verifiable request from your “authorized agent,” which is any person or legal entity registered with the California Secretary of State that you have authorized to act on your behalf, we will require:

1. Submission of a written document signed by you with your permission for the authorized agent to submit a verifiable request on your behalf and require the authorized agent to verify its own identity to us; or
2. Require your authorized agent to furnish a copy of a power of attorney pursuant to California Probate Code sections 4000 to 4465 and require the authorized agent to verify its own identity to us.

We will deny a request from an agent that does not submit proof that they have been authorized by you to act on your behalf and cannot verify their own identity to us.

#### **e. Response Timing and Format**

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request’s receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee 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.

#### **f. Right of Non-Discrimination**

We will not discriminate against you for exercising any of your rights in this Disclosure and under applicable laws. Unless permitted by law, 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 a different level or quality of goods or services.
- Suggest that you may receive a different price for goods or services or a different level or quality of goods or services.

## **VI. CHANGES TO THIS DISCLOSURE**

We reserve the right to amend this CCPA Disclosure at our discretion and at any time. When we make changes to this Disclosure, we will notify you by email or through a notice on our website's news page.

## **VII. CHILDREN'S ONLINE INFORMATION PRIVACY**

Our website is not intended for children under the age of 13. We do not knowingly collect, maintain, or use personally identifiable information from our website about children under the age of 13 without parental consent. For more information about the Children's Online Privacy Protection Act (COPPA), visit the Federal Trade Commission website at [ftc.gov](https://www.ftc.gov).

## **VIII. LINKING TO THIRD-PARTY WEBSITES**

We may provide links to websites that are owned or operated by other companies ("third-party websites"). When you use a link online to visit a third-party website, you will be subject to that website's privacy and security practices, which may differ from ours. You should familiarize yourself with the privacy policy, terms of use and security practices of the linked third-party website before providing any information on that website. We are not responsible for the third-party website's use, collection, sale or sharing of your personal information.

## **IX. SECURITY**

We use reasonable physical, electronic, and procedural safeguards that comply with federal standards to protect and limit access to personal information. This includes device safeguards and secured files and buildings. Please note that information you send to us electronically may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential information (such as your Social Security number) to us.

## **X. CONTACT INFORMATION**

If you have any questions or comments about this Disclosure, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights, visit [patelco.org/privacy](https://www.patelco.org/privacy) or call 800.358.8228.