

<b>Why?</b>	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.
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<b>What?</b>	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>n. Social Security number, date of birth and income</li> <li>o. Account balances and payment history</li> <li>p. Credit history</li> </ul> <p>When you are <i>no longer</i> our Member, we continue to share your information as described in this notice.</p>
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<b>How?</b>	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 LBS Financial Credit Union chooses to share; and whether you can limit this sharing.
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Reasons we can share your personal information	Does LBS Financial Credit Union share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes— information about your transactions and experiences	No	We don't share
For our affiliates' everyday business purposes— information about your creditworthiness	No	We don't share
For nonaffiliates to market to you	No	We don't share

<b>Questions?</b>	Call 800.527.3328 or go to <a href="http://lbsfcu.org">lbsfcu.org</a>
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What we do	
<b>How does LBS Financial Credit Union protect my personal information?</b>	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.
<b>How does LBS Financial Credit Union collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>Open an account or deposit money</li> <li>Give us your contact information</li> <li>Make a wire transfer</li> <li>Show your government-issued ID ■      Apply for a loan</li> </ul> <p>We also collect your personal information from others such as credit bureaus, affiliates or other companies.</p>
<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>n. sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>o. affiliates from using your information to market to you</li> <li>p. sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing.</p>

Definitions	
<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <i>LBS Financial Credit Union has no affiliates</i></li> </ul>

<b>Nonaffiliates</b>	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>■ <i>LBS Financial Credit Union does not share with nonaffiliates so they can market to you</i></li> </ul>
<b>Joint marketing</b>	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> <li>■ <i>LBS Financial Credit Union doesn't jointly market</i></li> </ul>
<b>Other important information</b>	
LBS Financial Credit Union abides by State privacy laws.	

## LBS Financial Credit Union California Consumer Privacy Act Policy and Disclosure

Effective Date: June 16, 2023  
Last Reviewed on: June 16, 2023

### [Download our Notice at Collection](#)

This **Privacy Policy for California Residents** supplements the information contained in LBS Financial Credit Union's [Privacy Policy](#) and applies solely to all visitors, users, and others, as well as owners, directors, officers and employees of companies that do business with the Credit Union, who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 as amended by the California Privacy rights Act of 2020 (CCPA), and its implementing regulations, and any terms defined in the CCPA have the same meaning when used in this Policy.

This Policy **does not apply** to workforce-related personal information collected from California-based employees, job applicants, contractors, or similar individuals.

Also, this Policy **does not apply** to information collected from California residents who apply for or obtain our financial products and services for personal, family, or household purposes as this information is subject to the Gramm-Leach-Bliley Act (GLBA), Fair Credit Reporting Act (FCRA), or California Financial Information Privacy Act (FIPA) and is excluded from the CCPA's scope. For more information on how we collect, disclose, and secure this information, please refer to our Member [Privacy Policy](#).

### **Information We Collect**

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("**personal information**"). Personal information does not include publicly available information from government records, or deidentified or aggregated consumer information.

We retain this information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

The table below describes the categories of personal information we have collected from consumers within the last twelve (12) months, the business purpose for the collection of that information, whether that category of information is sold or shared and for how long that category of information will be retained:

<b>Category of Personal Information Collected</b>	<b>Business Purpose for Collection</b>	<b>Sold or Shared</b>	<b>Retention</b>
<b>Identifiers</b> (A real name, alias, postal address, unique personal identifier, online	<ul style="list-style-type: none"> <li>• <b>Providing Member service, maintenance of accounts or processing transactions</b></li> <li>• <b>To prevent or respond to fraudulent or malicious activity</b></li> <li>• <b>Qualifying you for a product or service</b></li> </ul>		<ul style="list-style-type: none"> <li>• <b>As needed to manage Member accounts and services and comply with our legal obligations</b></li> <li>• <b>Raffle/sweepstakes information destroyed</b></li> </ul>

identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.)

- **Verifying your identity and contacting you about your account**
- **Providing information to you about our products and services**
- **Raffles/sweepstakes for giveaways where we collect a name and contact information for follow-up**

Not sold or shared

information destroyed within one month of event, with exception of winners or consumers who have asked for additional product information, in which case the information will be retained until no longer needed

**California Customer Records personal information**

(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.)

- **Providing Member service, maintenance of accounts or processing transactions**
- **To prevent or respond to fraudulent or malicious activity**
- **Qualifying you for a product or service**
- **Verifying your identity and contacting you about your account**
- **Providing information to you about our products and services**

Not sold or shared

- **As needed to manage Member accounts and services and comply with our legal obligations**

**Protected classification characteristics under California 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).)

- **Providing Member service, maintenance of accounts or processing transactions**
- **Complying with equal opportunity laws**
- **Performing analysis or research**
- **Enhancing the quality of our services**

Not sold or shared

- **As needed to manage Member accounts and services and comply with our legal obligations**

**Commercial information**

(Records of personal property, products

- **Providing Member service, maintenance of accounts or processing transactions**
- **Performing analysis or research**
- **Enhancing the quality of our**

- **As needed to manage Member accounts and**

or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.)

services

Not sold or shared

services and comply with our legal obligations

- **Verifying advertising impressions**
- **Qualifying you for a product or service**

**Biometric information**

(Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.)

- **Providing Member service, maintenance of accounts or processing transactions**
- **Disclosed to service providers and contractors (e.g Online and Mobile Banking provider) for the stated business purposes.**
- **Maintaining security and verifying your identity**

Not sold or shared

- **As needed to manage Member accounts and services and comply with our legal obligations**

**Internet or other similar network activity**

(Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.)

- **Providing Member service, maintenance of accounts or processing transactions**
- **Performing analysis or research**

Not sold or shared

- **As needed to manage Member accounts and services and comply with our legal obligations**

**Geolocation data**

(Physical location or movements.)

- **To provide closest ATM/branch information on a map within Mobile Banking or our lbsfcu.org website map**

Not sold or shared

- **As needed to manage Member accounts and services and comply with our legal obligations**

**Sensory data**

(Audio, electronic, visual, thermal, olfactory, or similar information.)

- **Voice mails from callers may be stored on our systems**
- **Videos may capture visitors to our branches or ATMs for fraud protection**
- **Photos of Members attending local events or Credit Union sponsored activities**

Not sold or shared

- **Voice mails are retained based upon recipient and business need**
- **Videos are retained indefinitely to comply with legal obligations**
- **Photos may publicly remain on social media indefinitely**

<b>Professional or employment-related information</b> (Current or past job history.)	<ul style="list-style-type: none"> <li>Collected when consumers apply for credit or from contractors or service providers for the purpose of locating a Member for debt collection</li> </ul>	Not sold or shared	<ul style="list-style-type: none"> <li>As needed to manage Member accounts and services and comply with our legal obligations</li> </ul>
<b>Non-public education information</b> (Education 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.)	<ul style="list-style-type: none"> <li>Applicants for the Credit Union's annual scholarship program submit their high school/college transcripts to apply for a scholarship.</li> </ul>	Not sold or shared	<ul style="list-style-type: none"> <li>Applications along with transcripts and supporting documents are kept as long as required to comply with legal obligations.</li> </ul>
<b>Inferences drawn from other personal information</b> (Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.)	<ul style="list-style-type: none"> <li>The Credit Union may purchase data from time to time to append to Member profiles for the purpose of improving communications and Member Service.</li> </ul>	Not sold or shared	<ul style="list-style-type: none"> <li>As needed to provide personalized service for existing Members</li> </ul>

The table below describes the categories of **sensitive personal information** we have collected from consumers within the last twelve (12) months, the business purpose for the collection of that information, whether that category of information is sold or shared and for how long that category of information will be retained:

Category of Sensitive Personal Information	Business Purpose for Collection	Sold or Shared	Retention
<b>Government identifiers</b> (social security, driver's license, state identification card, or passport number)	<ul style="list-style-type: none"> <li>Providing Member service, maintenance of accounts or processing transactions</li> <li>To prevent or respond to fraudulent or malicious activity</li> <li>Qualifying you for a product or service</li> <li>Verifying your identity and contacting you about your account</li> <li>Providing Member service, maintenance of accounts or processing transactions</li> </ul>	Not sold or shared	<ul style="list-style-type: none"> <li>As needed to manage Member accounts and services and comply with our legal obligations</li> </ul>

<b>Complete account access credentials</b> (user names, account numbers, or card numbers combined with required access/security code or password)	<ul style="list-style-type: none"> <li>• To prevent or respond to fraudulent or malicious activity</li> <li>• Qualifying you for a product or service</li> <li>• Verifying your identity and contacting you about your account</li> </ul>	Not sold or shared	<ul style="list-style-type: none"> <li>• As needed to manage Member accounts and services and comply with our legal obligations</li> </ul>
<b>Precise geolocation</b>	<ul style="list-style-type: none"> <li>• Not collected</li> </ul>	Not sold or shared	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
<b>Racial or ethnic origin</b>	<ul style="list-style-type: none"> <li>• Complying with equal opportunity laws</li> <li>• Performing analysis or research</li> <li>• Enhancing the quality of our services</li> </ul>	Not sold or shared	<ul style="list-style-type: none"> <li>• As needed to manage Member accounts and services and comply with our legal obligations</li> </ul>
<b>Religious or philosophical beliefs</b>	<ul style="list-style-type: none"> <li>• Not collected</li> </ul>	N/A	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
<b>Union membership</b>	<ul style="list-style-type: none"> <li>• Not collected</li> </ul>	N/A	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
<b>Genetic data</b>	<ul style="list-style-type: none"> <li>• Not collected</li> </ul>	N/A	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
<b>Mail, email, or text messages contents not directed to us</b>	<ul style="list-style-type: none"> <li>• The Credit Union occasionally receives accidental emails or text messages to our main phone number</li> </ul>	Not sold or shared	<ul style="list-style-type: none"> <li>• Most accidental emails, texts, and mail are destroyed upon receipt but it depends upon the email or phone number it may have been sent to as some of our emails may not be monitored by the individual</li> </ul>
<b>Unique identifying biometric information</b>	<ul style="list-style-type: none"> <li>• Not collected</li> </ul>	N/A	<ul style="list-style-type: none"> <li>• N/A</li> </ul>

<b>Health information</b>	• Not collected	N/A	• N/A
<b>Sex life, or sexual orientation information</b>	• Not collected	N/A	• N/A

### **Sources of Personal Information**

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

- Directly from you or your representatives;
- Service Providers, Consumer Data Resellers, Credit Reporting Agencies and other similar persons or entities;
- Public Record Sources (Federal, State or Local Government Sources);
- Information from our Affiliates;
- Website/Mobile App Activity/Social Media;
- Information from member directed persons or entities or institutions representing a member/prospect; and
- Information from business members about individuals associated with the business member (e.g., an employee or board member).

### **Use of Personal Information**

We may use or disclose the personal information we collect for one or more of the following purposes, but any sensitive personal information we collect about the consumer is used or disclosed only for the purposes set forth in Section 7027(m) of the California Code of Regulations and not for inferring characteristics about the consumer:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request or ask a question about our financial products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to apply for a financial product or enroll in a service, we will use that information to complete your request.
- To provide, support, personalize, and develop our Website, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your Website experience and to deliver content and financial 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, financial products and services, databases and 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 and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

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.

### **Sharing or Selling Personal Information**

## Sharing or Selling Personal Information

As used in this policy, and as defined in the CCPA, “share” means communicating a consumer’s personal information to a third party for cross-context behavioral advertising. We do not share your personal information. In the preceding twelve (12) months, the Credit Union has not shared personal information for cross-context behavioral advertising.

We do not sell personal information. In the preceding twelve (12) months, the Credit Union has not sold personal information.

## Disclosing Personal Information to Third Parties for Business Purposes

We have not made available your personal information to third parties in the preceding 12 months and do not disclose your personal information to third parties.

## Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. Please note, not all of the rights described above are absolute, and they do not apply in all circumstances. In some cases, we may limit or deny your request because the law permits or requires us to do so, or if we are unable to adequately verify your identity. This section describes your CCPA rights and explains how to exercise those rights.

### *Right to Know and Data Portability*

You have the right to request that we disclose certain information to you about our collection and use of your personal information (the “right to know”). Once we receive your request and confirm your identity (see Exercising Your CCPA Rights ), depending on the information you request, we will disclose to you:

- 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, selling or sharing that personal information.
- The categories of third parties, if any, to whom we make available that personal information.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - Sales, identifying the personal information categories that each category of recipient purchased; and
  - Disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.
- The specific pieces of personal information we collected about you (also called a data portability request).

### *Right to Delete*

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions (the “right to delete”). Once we receive your request and confirm your identity (see Exercising Your CCPA Rights), we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) or contractor(s) to:

Complete the transaction for which we collected the personal information, provide a financial product 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.

Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.

Debug products to identify and repair errors that impair existing intended functionality.



Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.

Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).

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 information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.

Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.

Comply with a legal obligation.

Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We will delete or deidentify personal information not subject to one of these exceptions from our records and will direct our service providers, contractors and other third parties, if any, to take similar action.

### ***Right to Correct***

You have the right to request that we correct any inaccurate personal information that we maintain about you (the "right to correct"). Once we receive your request and confirm your identity (see Exercising Your CCPA Rights), we will review your request correct the inaccurate information.

### ***Right to Opt-out of Sale or Sharing***

We do not sell or share your personal information. Therefore, we are not required to provide you with the right to opt-out of sale or sharing.

### ***Right to Limit***

We only use a consumer's sensitive personal information for the purposes identified in Section 7027(m) of the California Code of Regulations. Therefore, we are not required to give you notice of the right to limit the use of sensitive personal information or give you the opportunity to request that such information be limited.

### ***Right to be Free from Discrimination***

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

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

However, we may offer you certain financial incentives permitted by the CCPA that **can result** in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

### ***Exercising Your CCPA Rights***

To exercise your rights to know, delete or correct described above, please submit a request by either:

- Calling us at 800.527.3328, extension 5118
- Emailing us at [compliance@lbsfcu.org](mailto:compliance@lbsfcu.org) (do not include private information) or send us a Secure Message through [Online or Mobile Banking](#)
- [Completing our online form](#)

Only you, or someone legally authorized to act on your behalf, may make a request to know, delete or correct related to your personal information. When an authorized agent makes a request on your behalf, we may require proof that you gave the agent signed permission to submit the request, such as a power of attorney or other signed authorization. If your agent does not have a valid power of attorney, we may also require that you verify your identity directly with us and confirm directly with us that you provided the agent permission to submit the request on your behalf.

You may also make a request to know, delete, or correct on behalf of your child by providing proof of guardianship and/or child's birth certificate along with additional sufficient documentation to reasonably verify your identity (see below).

You may only submit a request to know twice within a 12-month period. Your request to know, delete, or correct must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include:
  - Government-issued identification, date of birth, social security number, and address.
  - For parents or guardians, submit letter of conservatorship or guardianship
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

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.

You do not need to create an account with us to submit a request to know or delete. [However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.]

We will only use personal information provided in the request to verify the requestor's identity or authority to make it.

### ***Response Timing and Format***

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please our Compliance team at 800.527.3328, ext. 5118.

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 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 our receipt of your request. For a request to know, you may request information collected beyond the 12-month period provided the information was collected on or after January 1, 2022, and providing the information would not be impossible or involve disproportionate effort. 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, specifically by attaching or including the information electronically through Online or Mobile Banking secure messaging or an alternative, secure method.

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.

### **Changes to Our Privacy Policy**

We reserve the right to amend this privacy policy at our discretion and at any time. When we make changes to this privacy policy, we will

we reserve the right to amend this privacy policy at our discretion and at any time. when we make changes to this privacy policy, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

### **Contact Information**

If you have any questions or comments about this notice, the ways in which LBS Financial Credit Union collects and uses your information described here and in the **Privacy Policy**, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

**Phone:** 800.527.3328, extension 5118

**Website:** [www.lbsfcu.org](http://www.lbsfcu.org)

**Email:** [compliance@lbsfcu.org](mailto:compliance@lbsfcu.org) (do not send any private information via email)

### **Postal Address:**

LBS Financial Credit Union

Attn: Compliance Department

P.O. Box 4860

Long Beach, CA 90804

**Secure Message:** Send us a secure message via [Online or Mobile Banking](#)

If you need to access this Policy in an alternative format due to having a disability, please contact [compliance@lbsfcu.org](mailto:compliance@lbsfcu.org) or 800.527.3328, extension 5118.

**[CCPA Privacy Policy for California Employees and Applicants](#)**

**[CCPA Notice of Collection for Applicants](#)**

**[CCPA Notice of Collection for Employees](#)**