

# PRIVACY NOTICE PURSUANT TO CALIFORNIA CONSUMER PRIVACY LAW EFFECTIVE JULY 1, 2020

This notice and these rights are applicable to California citizens and residents only pursuant to the California Civil Code Section 1798.145 (et seq).

Northrop Grumman Federal Credit Union (Credit Union) collects information about consumers, members, loan applicants, and borrowers in its business of providing financial service products to its membership. Those products include, but are not limited to, savings products, loan products, automated teller machine (ATM) access, access devices (such as debit or credit cards), electronic deposits and payments and special payment arrangements on loans.

# **CATEGORIES OF INFORMATION COLLECTED BY THE CREDIT UNION**

CATEGORY	EXAMPLES
A. Identifiers	A real name or alias; postal address; signature; home, mobile or work phone number; bank account 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. 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).
C. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
D. 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.
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. Sensory data	Audio, electronic, visual, or similar information.
H. Professional or employment related information.	Current or past job history, performance evaluations, disciplinary records, workplace injury records, disability accommodations, and complaint records; Emergency contact information, such as the name, phone number, postal and/or email address of another person in the context of having an emergency contact on file; Personal information necessary for us to collect and retain to administer benefits for you and another personal relating to you (e.g., your spouse, domestic partner, and dependents), such as their name, Social Security Number, date of birth, telephone number, email, and address.
I. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. § 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, or student financial information.
J. Inferences drawn from other personal information.	Profile reflecting a person's preference, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes

The information collected by the Credit Union is for the purpose of approving and/or denying application requests for accounts, services and other financial products. Such information may be shared with third parties contracted by the Credit Union to provide such services. Such services include, but are not limited to, check ordering, check paying, debit/credit card transactions, statement processing and mailing, and securing liens on real and personal property used as collateral on consumer loans.

The sharing of this information is permitted by both federal and state law for the purposes of completing transactions requested by the consumer. Examples of such sharing to complete transactions include providing name, address and similar information to check printing companies for printing consumer's checks, informing a business that the consumer has/has not available funds when using a debit or credit card to pay for a transaction, sharing required information with a state's motor vehicle department to obtain certificate of title showing consumer's ownership of a vehicle.

### Right to Know about Personal Information Collected, Disclosed, or Sold

You have a right to know what information the Credit Union collects, uses, discloses and sells.

If you wish to submit a request to know what information the Credit Union collects and uses, you may do so by:

- Calling the Credit Union's Call Center at 800-633-2848
- Sending a written request to: NGFCU California Privacy Request Attn: Compliance Department. Box 47009 Gardena, CA 90247
- Submitting a request online at www.ngfcu.us

## **Access to Specific information**

If exceptions do not apply, you or your authorized representative have the right to request this information twice in a 12-month period. The information we provide will cover the previous 12 month period. (The Credit Union reserves the right to determine if the representative has your specific permission to request this information on your behalf.)

If the request is valid and authorized, the Credit Union will disclose the following to you or your representative.

- Categories of personal information the Credit Union has collected about you
- The categories of sources of the personal information collected about you
- Our business or commercial purpose for collecting such information

Upon receiving a request to know, the Credit Union will confirm receipt of the request within 10 business days and provide information about how the Credit Union will process your request. The Credit Union will provide the data responsive to the request with 45 calendar days. If needed, the Credit Union may need an additional 45 calendar days to respond to the request. Should the additional 45 calendar days be required, the Credit Union will notify you and provide an explanation for the need of the additional days.

The Credit Union will not discriminate against any consumer who exercises rights under the CCPA consistent with this Privacy Policy.

#### Information Sold to Third Parties

The Credit Union has not and does not sell consumer information to third parties for cash or other consideration in the last 12 months. Thus, there is no opt-out request to not sell information.

# **Right to Delete Personal Information**

Since the Credit Union is a federally-chartered financial institution, information obtained in the course of its business is subject to the Federal Gramm-Leach-Bliley Act, Consumer Financial Protection Bureau Regulation P (12 CFR Part 1016), the California Financial Information Privacy Act (California Financial Code 4050 et seq) and other federal/state laws that require information be maintained for specific periods of time. Records subject to these laws and regulations cannot be deleted upon consumer request but only after record retention requirements for specific laws and regulations. In some cases the information must be permanently retained.

Also the Credit Union shares information with credit reporting agencies in accordance with the Federal Fair Credit Reporting Act and various state laws. This information is also not subject to deletion requests.

Since the Credit Union does not sell personal information, there is no right to delete or opt-out of the sale of personal information.

#### Who to contact for more information

If you wish more information about the Credit Union's privacy policies and practices, please contact the Credit Union and ask to speak with the Chief Compliance Officer.