

## FEDERAL LAW

FACTS	WHAT DOES THINKWISE FEDERAL CREDIT UNION DO WITH YOUR PERSONAL INFORMATION
<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.
<b>What?</b>	The types of personal information we collect and share depend on the accounts, products or services you have with us. This information can include: <ul style="list-style-type: none"> <li>• Name, address, Social Security Number, and income</li> <li>• Account balances and payment history</li> <li>• Credit history and credit scores</li> </ul>
<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 Thinkwise Federal Credit Union chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Thinkwise Federal Credit Union share?	Can you limit this sharing?
<b>For our everyday business purposes</b> —such as to process your transactions, maintain the account(s) you have with us, respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes</b> —to offer our products and services to you	Yes	Yes
<b>For joint marketing with other financial companies</b>	Yes	Yes
<b>For our affiliates' everyday business purposes</b> —information about your transactions and experiences	No	We do not share
<b>For our affiliates' everyday business purposes</b> —information about your creditworthiness	No	We do not share
<b>For our affiliates to market to you</b>	No	We do not share
<b>For non-affiliates to market to you</b>	No	We do not share

**To limit our sharing** Call 909-882-2911 or toll-free 877-882-2911, visit a branch or mail in the form below.

**Please Note:** If you are a *new* member, we can begin sharing your information thirty (30) days from the date we sent you this notice. When you are *no longer* our member, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

**Questions? Call us at 909-882-2911 or 877-882-2911, or visit us online at [thinkwisecu.org](http://thinkwisecu.org).**

Mail-In Form			
If you are on a multiple owner account, your choice(s) will apply to everyone on the account unless you mark below. <input type="checkbox"/> Apply my choices only to me.	Do not share my personal information with other financial institutions to jointly market to me.		
	Name		Account No. <input style="width: 90%;" type="text"/>
	Address	<input style="width: 98%;" type="text"/>	
	City, State, ZIP	<input style="width: 98%;" type="text"/>	
<b>Mail to: Thinkwise Federal Credit Union, 599 North E Street, San Bernardino, CA 92401</b>			

<b>Who We Are</b>	
Who is providing this notice?	Thinkwise Federal Credit Union.
<b>What We Do</b>	
How does Thinkwise Federal Credit Union protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards, secured files and buildings, procedural safeguards and safe record storage. We will continue to review and modify our security controls in the future to deal with changes in products, services and technology.
How does Thinkwise Federal Credit Union collect my personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> <li>• start an account</li> <li>• apply for a loan</li> <li>• use your credit or debit card</li> <li>• pay your bills</li> <li>• make deposits to or withdrawals from the accounts you have with us</li> </ul> We also collect your personal information from others, including credit bureaus or other companies.
Why can't I limit all sharing?	Federal law only gives you the right to limit: <ul style="list-style-type: none"> <li>• sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>• affiliates from using your information to market to you</li> <li>• sharing for non-affiliates to market to you</li> </ul> State laws and individual companies may give you additional rights to limit sharing.
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on the account you have with us -- unless you tell us otherwise.

<b>Definitions</b>	
<b>Affiliates</b>	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• <i>Thinkwise Federal Credit Union has no affiliates.</i></li> </ul>
<b>Non-affiliates</b>	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• <i>Thinkwise Federal Credit Union does not share with non-affiliates so that they can market to you.</i></li> </ul>
<b>Joint marketing</b>	A formal agreement between non-affiliated financial companies that together market financial products or services to you. Our marketing partners include: <ul style="list-style-type: none"> <li>• <i>Investment companies</i></li> <li>• <i>Insurance companies</i></li> <li>• <i>Other financial service providers</i></li> </ul>

<b>Other Important Information</b>
California law provides that a consumer has the right to control the sharing of personal and financial information with outside companies the financial institution contracts with to provide financial products and services. To exercise your right, refer to the separate notice titled, "Important Privacy Choices for Consumers" which is provided to you by Thinkwise Federal Credit Union.

**CALIFORNIA LAW**

**What is personal information?**

*Personal Information.* Under the CCPA your “Personal Information” includes the following data that identifies, relates to or may be associated with you:

- Demographic information (i.e., name, address, email),
- A unique identifier, such as an IP address,
- Account or Social Security Number,
- Driver’s license or passport,
- Personal property records,
- Card numbers,
- Access codes (PINs & passwords),
- Online activity,
- Biometric, geolocation, employment and education data,
- Browsing and search history, and
- Information concerning a consumer’s interaction with a website.

Personal information also includes information that is identifiable to your household.

**Thinkwise Federal Credit Union Collection of Member Personal Information**

**Categories of Member Personal Information We Collect**

Your personal information that we collect may include:

- Personal identifier information: name, email address, social security number, driver’s license number, access codes,
- Account & transaction information: account number, card number, account information, transaction information, and credit information and required consents, opt-in & opt-out requests.

**Where We Collect Member Personal Information**

We collect the categories of personal information listed above when you: visit our website or submit an online application, conduct any branch, mail or online transaction, use the Personal Finance Manager program or send us an e-mail, or phone inquiry.

**Thinkwise Federal Credit Union Use and Sharing of Member Personal Information**

**How We May Use Member Personal Information**

We may use each category of personal information we collect for the following purposes:

- To verify the identity of the person conducting the account transaction or inquiry with us or our service providers,
- To fulfill account or service requests that you initiate,
- To prevent fraud or meet legal requirements.

We have never sold, and we will not sell any of your personal information to anyone.

**How We May Share Member Personal Information**

We may share your personal identifiable information with 1) our third-party service providers and payment processor to facilitate your services or transactions, or 2) other financial companies with whom we have a joint marketing agreement.

**Your Rights to Protect Your Personal Information**

**Right to Request Access to Your Personal Information**

You have a right to access your personal information that we have collected. Upon your request by mail, email or in person to the Credit Union, we will disclose any of the following information requested:

- The categories of personal information collected,
- The sources from which personal information was collected,
- Our purpose for collecting the information,
- The categories of third parties with whom we share personal information, and
- The specific pieces of your personal information we have collected.

**Your Rights to Protect Your Personal Information (continued)**

<p><b>Right to Request Your Personal Information Be Deleted</b></p>	<p>You have the right to request that we delete personal information about you that we have collected. Upon your verifiable request by mail, email or in person to the Credit Union, we will delete the information and direct our service providers to delete the information from its records unless we or service provider needs the personal information. The following are the exceptions where the Credit Union and our service providers need the personal information to maintain and service your account and cannot delete the information:</p> <ul style="list-style-type: none"> <li>• To process your transactions for which the personal information was collected,</li> <li>• To provide the account or service requested,</li> <li>• To detect security incidents, protect against fraudulent, or illegal activity,</li> <li>• To identify and correct any Credit Union systems errors,</li> <li>• To comply with the California Electronic Communications Privacy Act,</li> <li>• To operate the systems and applications to maintain your accounts and services,</li> </ul> <p>To comply with a legal obligation or in a lawful manner compatible with the context in which you provided the information.</p>
<p><b>Right to Opt Out of the Sale of Your Personal Information</b></p>	<p>The Credit Union does not sell any member personal information to any third party.</p>
<p><b>Right to Equal Services and Pricing</b></p>	<p>You have the right to receive equal service and pricing from us even if you choose to exercise any of your privacy rights. We will not discriminate against you for exercising any of the consumer’s rights, including:</p> <ul style="list-style-type: none"> <li>• denying accounts or services to you,</li> <li>• charging different prices or rates for accounts or services or imposing penalties,</li> <li>• providing a different level or quality of accounts or services to you or suggesting that you will receive a different price or rate for accounts or services or a different level or quality of accounts or services.</li> </ul>

**Additional Online Privacy Protections**

**Use of Cookies.** Thinkwise Federal Credit Union uses cookies when you visit our website. These cookies are essential for enabling user movement around our website and providing access to features such as your member-only resources, online banking, and other secure areas of the website. These cookies do not gather information about you that could be used for marketing purposes and do not remember where you have been on the internet and Thinkwise Federal Credit Union does not track or sell this data. This category of cookies cannot be disabled.

**California Do Not Track Disclosures.** Certain web browsers offer a “Do Not Track” (DNT) option that permits users to select a preference not to have information about web browsing activities monitored and collected. Our website will not honor DNT signals from you and we will not monitor or collect information of your browsing activity.

**Mobile Privacy.** No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

Our Privacy Policy is posted on our website: [www.thinkwisecu.org](http://www.thinkwisecu.org).  
 You can reach us by calling **909-882-2911** or **877-882-2911**.

**Privacy Policy Changes.** We reserve the right to amend this Privacy Policy at our discretion and at any time. We will post our amended Privacy Policy on our website or otherwise notify you as required by law.

## 1. Scope and Overview

This policy outlines how Thinkwise Credit Union, its vendors, and/or the licensor of the Thinkwise Credit Union's consumer verification software processes biometric data collected from you for identity verification and fraud prevention purposes.

### a. Biometric Data Defined

As used in this policy, biometric data includes "biometric identifiers" and "biometric information". "Biometric identifier" means a retina or iris scan, fingerprint, voiceprint, or scan of hand or face geometry. As the term is used in this policy, the selfie photograph you upload to the software for use in the biometric algorithm is considered a "biometric identifier." "Biometric information" means any information, regardless of how it is captured, converted, stored, or shared, based on an individual's biometric identifier used to identify an individual.

### b. Disclosure and Authorization Policy

To the extent that Thinkwise Credit Union, its vendors, and/or the licensor of the Thinkwise Credit Union's consumer verification software collect, capture, or otherwise obtain biometric data relating to a consumer, Thinkwise Credit Union must first:

- Inform each consumer that Thinkwise Credit Union, its vendors, and/or the licensor of the Thinkwise Credit Union's consumer verification software are collecting, capturing, or otherwise obtaining the employee's biometric data, and that the Thinkwise Credit Union is providing such biometric data to its vendors and the licensor of the Thinkwise Credit Union's consumer verification software;
- Inform the consumer of the specific purpose and length of time for which the consumer's biometric data is being collected, stored, and used; and
- Receive consent by the consumer authorizing Thinkwise Credit Union, its vendors, and/or Thinkwise Credit Union's consumer verification software to collect, store, and use the consumer's biometric data for the specific purposes disclosed by the Thinkwise Credit Union, and for Thinkwise Credit Union to provide such biometric data to its vendors and the licensor of the Thinkwise Credit Union's consumer verification software.

Thinkwise Credit Union, its vendors, and/or the licensor of the Thinkwise Credit Union's consumer verification software will not sell, lease, trade, or otherwise profit from employees' biometric data; provided, however, that the Thinkwise Credit Union's vendors and the licensor of the Thinkwise Credit Union's consumer verification software may be paid for products or services used by Thinkwise Credit Union that utilize such biometric data.

This policy is intended to comply with all federal, state, and local laws.

### c. Purpose for the Collection of Biometric Data

Thinkwise Credit Union, its vendors, and/or the licensor of Thinkwise Credit Union's consumer verification software collect, store, and use biometric data solely for identity verification and fraud prevention purposes.

### d. Disclosure

Thinkwise Credit Union will not disclose or disseminate any biometric data to anyone other than its vendors and the licensor of the Thinkwise Credit Union's consumer verification software providing products and services using biometric data without/unless:

- First obtaining consumer consent to such disclosure or dissemination;
- The disclosed data completes a financial transaction requested or authorized by the consumer;
- Disclosure is required by law or ordinance; or
- Disclosure is required pursuant to a valid warrant or subpoena issued by a court of competent jurisdiction.

### e. Security

Thinkwise Credit Union shall use a commercially reasonable standard of care to store, transmit and protect from disclosure any biometric data collected. Such storage, transmission, and protection from disclosure shall be performed in a manner that is the same as or more protective than the manner in which Thinkwise Credit Union stores, transmits and protects from disclosure other confidential and sensitive information, including personal information that can be used to uniquely identify an individual or an individual's account or property, such as genetic markers, genetic testing information, account numbers, PINs, driver's license numbers and social security numbers.

### f. Retention

Thinkwise Credit Union shall retain consumer biometric data only until, and shall request that its vendors and the licensor of Thinkwise Credit Union's consumer verification software permanently destroy such data when, the first of the following occurs:

- The initial purpose for collecting or obtaining such biometric data has been satisfied, such as verification of consumer identity;
- Request of consumer to destroy the biometric data; or
- Within 30 days of consumer's provisioning of biometric data.

### g. Contact Information

If you have any questions about our use, storage, or security of your biometric data you can contact us at: [myaccount@thinkwisecu.org](mailto:myaccount@thinkwisecu.org).

## 2. Biometric Information Consumer Consent

As outlined in the "Biometric Information Privacy Policy", I understand and consent to the collection, use, retention, storage, and/or disclosure or re-disclosure of data or images from biometric verification technology by Thinkwise Credit Union, its vendors, and/or the licensor of the Thinkwise Credit Union's consumer verification software. I acknowledge that I have been given a copy of the Policy, or that the Policy has been made accessible to me, and I have had an opportunity to review it and request any additional information concerning the Thinkwise Credit Union's procedures and safeguards for collecting, maintaining, using, disclosing, sharing, storing, and/or destroying this data.