

South Carolina Federal Credit Union Privacy Notice for California Residents

Effective Date: September 28, 2020

Last Reviewed: September 28, 2020

Your privacy is important to us. This California Consumer Privacy Notice explains how South Carolina Federal collects, uses, and discloses personal information related to California residents. We have adopted this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Notice.

This Notice is for California residents only and supplements the information contained in South Carolina Federal's [Privacy Notice/Do Not Call Notice](#).

The CCPA does not apply to certain information that is covered by other regulations, such as the Gramm-Leach-Bliley Act (“GLBA”) and the Fair Credit Reporting Act (“FCRA”), therefore, most of the information collected and used by South Carolina Federal is not subject to CCPA.

I. Categories of Information We Collect

We may have collected in the preceding twelve (12) months, the following categories of personal information from consumers or members (some categories may overlap):

Category	Examples	Collected
A. Identifiers and consumer records information	A real name, alias, postal address, email address, telephone number, account name, Social Security number, driver's license or state identification number, passport number, bank account number, debit card or credit card number, or any other financial information, unique personal identifier, online identifier, Internet Protocol (IP) address, or other similar identifiers.	Yes
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).	Yes
C. Commercial information.	Records of personal property; products or services purchased, obtained, or considered; or other purchasing or consuming histories or tendencies.	Yes
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,	No

	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.	Yes
F. Geolocation data.	Physical location or movements. For example, IP location and, with your permission in accordance with your mobile device settings, precise geolocation information from GPS-based functionality on your mobile devices.	Yes
G. Sensory data.	Audio, electronic, visual, thermal, or similar information.	Yes
H. Professional or employment-related information.	Current or past job history or performance evaluations.	Yes
I. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	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.	No
J. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No

II. Categories of Sources of Information We Collect

South Carolina Federal obtains the categories of personal information listed above from the following categories of sources:

- a. From You or Your Authorized Agent – For example, by telephone, email, or from forms you complete or products and services you request.
- b. Indirectly from You – By observing your actions on our website and mobile apps.
- c. Third Party Service Providers to Provide Services or for Our Business Purposes - We collect information from third-party service providers that interact with us in connection with the services we perform or for our operational purposes. For example, a credit report we obtain from a credit bureau to evaluate a loan application, assist in identifying you, or to help us detect security incidents and fraudulent activity.

III. Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, you apply for membership or a loan, we will use that personal information to provide our products and services. The information may also be used to facilitate new/future applications or process transactions.
- To process your requests, applications, transactions, payments, and prevent transactional fraud.
- To personalize your Website experience and to deliver content and 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, when required by law).
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- 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.
- 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.
- To meet regulatory requirements, such as the Home Mortgage Disclosure Act.

IV. Sharing Personal Information

We may share your personal information with a third party for business purposes, to perform services for us, or to function on our behalf.

The general categories of third parties we share with are as follows:

1. Our third party service providers;
2. Other third parties to help deliver our products and services to you, such as our websites, email communications, social media, or other internet-based messaging;

3. Our affiliates in an effort to bring you improved service across our family of products and services when permissible under relevant laws and regulations;
4. Consumer reporting agencies;
5. Third parties to whom you or your agents authorize the disclosure of your personal information in connection with products or services we provide to you;
6. Law enforcement and regulatory agencies to comply with our legal and regulatory obligations.

In the preceding 12-months, we may have disclosed the following categories of personal information for a business purpose and, for each category, the following categories of third parties with whom such personal information was shared:

Category of Personal Information (Represented in alphabetical form from the categories listed in Section 1)	Category of Third Parties (Represented in numerical form from the categories of third parties identified in this Section)
A. Identifiers and consumer records information	1, 2, 3, 4, 5, 6
B. Protected classification characteristics under state or federal law	1, 3, 4, 5, 6
C. Commercial Information	1, 2, 3, 4, 5, 6
D. Biometric Information	N/A
E. Internet or other similar network activity	2, 3, 5, 6
F. Geolocation data	2, 5, 6
G. Sensory data	2, 5, 6
H. Professional or employment related information	1, 2, 4, 5, 6
I. Non-public education information	N/A
J. Inferences drawn from other personal information	N/A

V. Sales of Personal Information

In the preceding twelve (12) months, South Carolina Federal has not sold personal information subject to the CCPA, including personal information of minors under the age of 16. For purposes of this Notice, “sold” means the disclosure of Personal Information to a third party for monetary or other valuable consideration.

VI. California Residents Rights Under CCPA

This section describes the rights under CCPA for California residents and explains how to exercise those rights. You have the right to:

- a. Request that we disclose to you, free of charge, the following information covering the 12 months preceding your request:
 - The categories of personal information collected about you;
 - The categories of sources from which personal information was collected;
 - Our business purpose for collecting personal information about you;
 - The categories of third parties with whom we disclosed that personal information; and
 - The specific pieces of personal information we collected about you.
- b. Request that we delete personal information collected about you, unless the CCPA recognizes an exception;
- c. Be free from unlawful discrimination for exercising your rights under the CCPA.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information and no more than twice within a 12-month period. Making a verifiable consumer request does not require you to create an account with us.

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

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time to process your request (up to an additional 45 days), we will inform you of the reason and extension period in writing.

Any disclosures we provide will only cover the 12-month period preceding the receipt of the verifiable consumer request. In some instances, we may not be able to honor your request. For example, we will not honor your request if we cannot verify your identity. Additionally, we will not honor your request if an exception applies, such as where the personal information that we maintain about you is not subject to the CCPA's access or deletion rights. The response we provide will explain the reasons we cannot comply with a request if applicable.

VII. How to Exercise Your Rights

Please submit a verifiable consumer request to us by either:

- Calling us at 800-845-0432
- Visiting <https://www.scfederal.org/contact-us>

VIII. Questions or Concerns

If you have any questions or comments about this notice or the ways in which South Carolina Federal collects and uses your personal information, please do not hesitate to contact us at:

Phone: 800-845-0432

Postal Address:

South Carolina Federal Credit Union
Attn: Compliance Department
PO Box 190012
North Charleston, SC 29419-9012

We reserve the right to amend this Notice at our discretion and at any time. When we make changes to this Notice, we will post the updated notice on our website with a new "Last Reviewed" date.