



## Notice at Collection- Consumers

**Effective Date:** June 16, 2023

LBS Financial Credit Union is collecting your personal information and sensitive personal information to support its business operations, including for the business purposes listed in the chart below.

We will not sell the personal information we collect. We also will not share it with third parties for cross-context behavioral advertising. We will not sell the sensitive personal information we collect. We also will not share it with third parties for cross-context behavioral advertising. To view our full privacy policy, visit [lbsfcu.org/california-online-privacy-notice](https://lbsfcu.org/california-online-privacy-notice).

We may collect the personal information and sensitive personal information categories listed in the tables below. The tables also list, for each category, use purposes, and whether we sell the information or share it with third parties for cross-context behavioral advertising. We retain this information for as long as necessary to fulfill 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.

### *Personal Information*

Category of Personal Information Collected	Business Purpose for Collection	Sold or Shared	Retention
<p><b>Identifiers</b> (A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.)</p>	<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 information to you about our products and services</li> <li>• Raffles/sweepstakes for giveaways where we collect a name and contact information for follow-up</li> </ul>	<p>Not sold or shared</p>	<ul style="list-style-type: none"> <li>• As needed to manage Member accounts and services and comply with our legal obligations</li> <li>• Raffle/sweepstakes 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</li> </ul>

<p><b>California Customer Records personal information</b></p> <p>(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.)</p>	<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 information to you about our products and services</li> </ul>	<p>Not sold or shared</p>	<ul style="list-style-type: none"> <li>• As needed to manage Member accounts and services and comply with our legal obligations</li> </ul>
<p><b>Protected classification characteristics under California or federal law</b></p> <p>(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).</p>	<ul style="list-style-type: none"> <li>• Providing Member service, maintenance of accounts or processing transactions</li> <li>• Complying with equal opportunity laws</li> <li>• Performing analysis or research</li> <li>• Enhancing the quality of our services</li> </ul>	<p>Not sold or shared</p>	<ul style="list-style-type: none"> <li>• As needed to manage Member accounts and services and comply with our legal obligations</li> </ul>
<p><b>Commercial information</b></p> <p>(Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.)</p>	<ul style="list-style-type: none"> <li>• Providing Member service, maintenance of accounts or processing transactions</li> <li>• Performing analysis or research</li> <li>• Enhancing the quality of our services</li> <li>• Verifying advertising impressions</li> <li>• Qualifying you for a product or service</li> </ul>	<p>Not sold or shared</p>	<ul style="list-style-type: none"> <li>• As needed to manage Member accounts and services and comply with our legal obligations</li> </ul>

<p><b>Biometric information</b> (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.)</p>	<ul style="list-style-type: none"> <li>• Providing Member service, maintenance of accounts or processing transactions</li> <li>• Disclosed to service providers and contractors (e.g Online and Mobile Banking provider) for the stated business purposes.</li> <li>• Maintaining security and verifying your identity</li> </ul>	<p>Not sold or shared</p>	<ul style="list-style-type: none"> <li>• As needed to manage Member accounts and services and comply with our legal obligations</li> </ul>
<p><b>Internet or other similar network activity</b> (Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.)</p>	<ul style="list-style-type: none"> <li>• Providing Member service, maintenance of accounts or processing transactions</li> <li>• Performing analysis or research</li> </ul>	<p>Not sold or shared</p>	<ul style="list-style-type: none"> <li>• As needed to manage Member accounts and services and comply with our legal obligations</li> </ul>
<p><b>Geolocation data</b> (Physical location or movements.)</p>	<ul style="list-style-type: none"> <li>• To provide closest ATM/branch information on a map within Mobile Banking or our lbsfcu.org website map</li> </ul>	<p>Not sold or shared</p>	<ul style="list-style-type: none"> <li>• As needed to manage Member accounts and services and comply with our legal obligations</li> </ul>
<p><b>Sensory data</b> (Audio, electronic, visual, thermal, olfactory, or similar information.)</p>	<ul style="list-style-type: none"> <li>• Voice mails from callers may be stored on our systems</li> <li>• Videos may capture visitors to our branches or ATMs for fraud protection</li> <li>• Photos of Members attending local events or Credit Union sponsored activities</li> </ul>	<p>Not sold or shared</p>	<ul style="list-style-type: none"> <li>• Voice mails are retained based upon recipient and business need</li> <li>• Videos are retained indefinitely to comply with legal obligations</li> <li>• Photos may publicly remain on social media indefinitely</li> </ul>
<p><b>Professional or employment-related information</b> (Current or past job history.)</p>	<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>	<p>Not sold or shared</p>	<ul style="list-style-type: none"> <li>• As needed to manage Member accounts and services and comply with our legal obligations</li> </ul>

<p><b>Non-public education information</b></p> <p>(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.)</p>	<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>	<p>Not sold or shared</p>	<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>
<p><b>Inferences drawn from other personal information</b></p> <p>(Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.)</p>	<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>	<p>Not sold or shared</p>	<ul style="list-style-type: none"> <li>• As needed to provide personalized service for existing Members</li> </ul>

***Sensitive Personal Information***

<b>Category of Sensitive Personal Information</b>	<b>Business Purpose for Collection</b>	<b>Sold or Shared</b>	<b>Retention</b>
<p><b>Government identifiers</b></p> <p>(social security, driver's license, state identification card, or passport number)</p>	<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> </ul>	<p>Not sold or shared</p>	<ul style="list-style-type: none"> <li>• As needed to manage Member accounts and services and comply with our legal obligations</li> </ul>
<p><b>Complete account access credentials</b></p> <p>(user names, account numbers, or card numbers combined with required access/security code or password)</p>	<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> </ul>	<p>Not sold or shared</p>	<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>To provide closest ATM/branch information on a map within Mobile Banking or our lbsfcu.org website map</li> </ul>	Not sold or shared	<ul style="list-style-type: none"> <li>Until user uninstalls/reinstalls mobile app and changes settings or clears cache on browser</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>	<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>Sex life, or sexual orientation 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>

If you have any questions about this Notice or need to access it in an alternative format due to having a disability, please contact [compliance@lbsfcu.org](mailto:compliance@lbsfcu.org) (do not include personal information), send a Secure Message through Online or Mobile Banking, or call 800.527.3328, extension 5118.