



**COMMERCIAL LENDING PRIVACY NOTICE  
AT COLLECTION OF PERSONAL INFORMATION**

Last Updated and Effective: 06.19.2020

Your privacy is important to UNIFY Financial Credit Union. This Commercial Lending Privacy Notice at Collection of Personal Information (“NOTICE”) supplements the information contained in the California Consumer Privacy Policy of UNIFY and applies solely to visitors, users, and others who reside in the State of California (“consumers” or “you”) under the California Consumer Privacy Act of 2018 (“CCPA”). We adopt this notice to comply with the CCPA. Any terms defined in the CCPA have the same meaning when used in this notice. This NOTICE provides a summary of how we collect, use and share your personal information. We encourage you to read our Privacy Policy (Federal), which is available online at: <https://www.UnifyFCU.com/privacypolicy>

**I. CATEGORIES OF INFORMATION WE COLLECT**

We collect the following categories of personal information when you apply for a loan with us, provide us with your financial information, allow us to obtain information regarding your creditworthiness from third-parties, visit our premises, use our ATMs, or through your other personal interactions with us (please note that some categories overlap):

| <b>Category</b>  | <b>Examples</b>  |
|--|--|
| A. Identifiers   | A real name or alias; postal address; signature; home phone number or mobile 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. Internet or other similar network activity                          | Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.   |
| E. 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, address and email address of another person in  |

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|   | 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. |
| F. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 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.  |
| G. Inferences drawn from other personal information.  | Profile reflecting a person’s preference, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.  |

Personal information for purposes of the CCPA does not include:

- Publicly available information from government records;
- De-identified or aggregated consumer information.; and
- Information excluded from the CCPA's scope, like:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

**II. HOW WE USE YOUR PERSONAL INFORMATION**

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

- To fulfill or meet the reason for which the information is provided. For example, to underwrite, process and service a loan that you have applied for.
- To sell all or part of a loan to which you are obligated as borrower, guarantor, pledgor or other loan party to a third-party.
- To provide you with information, products or services that you request from us.
- 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 between you and us, including for billing and collections.
- To improve our website and present its contents to you.
- For testing, research, analysis to improve our products and services and for developing new ones.
- To protect the rights, property or safety of us, our employees, our members or others.
- To detect security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.

- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, in which personal information held by us is among the assets transferred.
- Advertising our membership, products and services to you.
- Enabling or effecting, directly or indirectly, a commercial transaction.

### **III. SELLING PERSONAL INFORMATION**

It is not our policy to sell personal information and we have not done so in the preceding 12 months.

### **IV. CONTACT INFORMATION**

If you have any questions or comments about this Notice or our Privacy Policy, please do not hesitate to contact us at:

Phone: 1-877-871-7304

Mail: Attn: Compliance, UNIFY FCU, 1355 S. Clearview Ave., Suite 400, Mesa, Az 85209

Website: [www..UnifyFCU.com](http://www.UnifyFCU.com) and click the link provided here:

<https://www.UnifyFCU.com/CCPA> to exercise your rights.

Within 10 days of a complete submitted form received by UNIFY, a member of our Compliance team will notify you that we received the request and what is needed to verify your identity.