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## CCPA Privacy Notice for California Residents

**Last Updated:** May 22, 2020

This Privacy Notice for California Residents supplements the information contained in MIT Federal Credit Union's Privacy Policy. MIT Federal Credit Union has adopted this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any implementing regulations, to the extent such laws and regulations are applicable to MIT Federal Credit Union. It serves to provide the consumer with a description of our online and offline practices regarding the collection, use, disclosure, and sale of personal information. For more information, please see MIT Federal Credit Union's Consumer Privacy Policy.

### INFORMATION WE COLLECT AND USE

MIT Federal Credit Union collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("personal information"). Most of MIT Federal Credit Union's collection of personal information is exempted from the CCPA. Nonetheless, MIT Federal Credit Union has collected the following categories of personal information from consumers within the last 12 months, which is not exempted from the CCPA:

CATEGORY OF PERSONAL INFORMATION COLLECTED	ADDITIONAL DETAILS
<p><b>Identifiers</b>, such as 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>	<p><b>Where We Get It From</b>            Directly from you (for example, from forms or surveys you complete or products and services you use).            Indirectly from you (for example, from observing your actions on our website).</p> <p><b>How We Use It</b>            Auditing a current interaction with you (such as verifying ad impressions) .            Preventing and responding to security incidents and other malicious or illegal activity.            Short-term, transient use (such as ad customization).            Performing services such as maintaining your account, providing customer service, or processing transactions.            Verifying or enhancing the quality or safety of our products and services.            Advancing a commercial transaction (such as delivering targeted ads).</p> <p><b>Who We Share It With</b>            Service providers (for example, online advertising providers, survey administrators).            Joint marketing partners (for example, insurance companies).</p>

CATEGORY OF PERSONAL INFORMATION COLLECTED	ADDITIONAL DETAILS
<p><b>Personal information categories</b>, such as 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 other financial information.</p>	<p><b>Where We Get It From</b> Directly from you (for example, from forms or surveys you complete or products and services you use).</p> <p><b>How We Use It</b> Preventing and responding to security incidents and other malicious or illegal activity. Performing services such as maintaining your account, providing customer service, or processing transactions. Undertaking research and development. Verifying or enhancing the quality or safety of our products and services. Advancing a commercial transaction (such as delivering targeted ads).</p> <p><b>Who We Share It With</b> Service providers (for example, survey administrators). Joint marketing partners (for example, insurance companies).</p>
<p><b>Protected classification characteristics</b>, such as age, 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.</p>	<p><b>Where We Get It From</b> Directly from you (for example, from forms or surveys you complete or products and services you use).</p> <p><b>How We Use It</b> Performing services such as maintaining your account, providing customer service, or processing transactions. Undertaking research and development. Verifying or enhancing the quality or safety of our products and services.</p> <p><b>Who We Share It With</b> Service providers (for example, survey administrators).</p>
<p><b>Internet or other similar network activity</b>, such as browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.</p>	<p><b>Where We Get It From</b> Indirectly from you (for example, from observing your actions on our website). From third-party business partners (such as joint marketing partners and analytics providers).</p> <p><b>How We Use It</b> Auditing a current interaction with you (such as verifying ad impressions). Preventing and responding to security incidents and other malicious or illegal activity. Debugging errors. Short-term, transient use (such as ad customization). Advancing a commercial transaction (such as delivering targeted ads).</p> <p><b>Who We Share It With</b> Service providers (for example, online advertising providers).</p>

CATEGORY OF PERSONAL INFORMATION COLLECTED	ADDITIONAL DETAILS
<p><b>Geolocation data</b>, such as physical location or movements.</p>	<p><b>Where We Get It From</b> Indirectly from you (for example, from observing your actions on electronic devices).</p> <p><b>How We Use It</b> Auditing a current interaction with you (such as verifying ad impressions) . Preventing and responding to security incidents and other malicious or illegal activity. Short-term, transient use (such as ad customization). Advancing a commercial transaction (such as delivering targeted ads).</p> <p><b>Who We Share It With</b> Service providers (for example, online advertising providers) .</p>
<p><b>Sensory data</b>, such as audio, electronic, visual, or similar information.</p>	<p><b>Where We Get It From</b> Directly from you (for example, from your participation in a recorded focus group). Indirectly from you (for example, from observing your actions on our website or at our branches).</p> <p><b>How We Use It</b> Preventing and responding to security incidents and other malicious or illegal activity. Performing services such as maintaining your account, providing customer service, or processing transactions. Verifying or enhancing the quality or safety of our products and services.</p> <p><b>Who We Share It With</b> Service providers, legal entities and joint marketing partners (for example, insurance companies).</p>
<p><b>Inferences drawn from other personal information</b>, such as a profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior attitudes, intelligence, abilities, and aptitudes.</p>	<p><b>Where We Get It From</b> Directly from you (for example, from forms or surveys you complete). Indirectly from you (for example, from observing your actions on our website). From data aggregators.</p> <p><b>How We Use It</b> Short-term, transient use (such as ad customization). Advancing a commercial transaction (such as delivering targeted ads).</p> <p><b>Who We Share It With</b> Service providers (for example, online advertising providers) .</p>

### DISCLOSURE OR SALE OF PERSONAL INFORMATION

MIT Federal Credit Union may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to keep that information confidential and not use it for any purpose except performing the contract. Within the preceding 12 months, we have shared personal information with third parties for a business purpose as identified in the chart above.

MIT Federal Credit Union has not sold your personal information to any third parties.

## YOUR RIGHTS AND CHOICES

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your rights and explains how to exercise those rights, under the CCPA.

### Request to Know Specific Information and Data Portability Rights

You have the right to request that MIT Federal Credit Union disclosed certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable request, and confirm the information you seek is covered by the CCPA, we will disclose to you:

- The categories of personal information we collected about you;
- The categories of sources for the personal information we collected about you;
- Our business purpose for collecting or selling that personal information;
- The categories of third parties with whom we share that personal information;
- The specific pieces of personal information we collected about you (also called a data portability request); and
- If we disclosed your personal information for a business purpose, we will identify the personal information categories that each category of recipient obtained.

### Deletion Request Rights

You have the right to request that MIT Federal Credit Union delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable request, and confirm the information you request be deleted is covered by the CCPA, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a service you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products or services to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
- Engage in public or peer-reviewed research in the public interest;
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- Comply with a legal obligation; or
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### Exercising Request to Know, Data Portability, and Deletion Rights

To exercise the request to know, data portability, and deletion rights described above, please submit a verifiable request to us by:

- Calling us at **617-253-2845** or toll-free at **855-MIT-CU4U** (855-648-2848)
- Visiting [www.mitfcu.org/CCPA](http://www.mitfcu.org/CCPA) to complete and submit the California Consumer Request Form; or
- Visiting a MIT Federal Credit Union branch to complete and submit a request form

Only you, or an authorized agent, may make a verifiable request related to your personal information.

You may make a verifiable request to know or data portability twice within a 12-month period. The verifiable request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

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. Making a verifiable request does not require you to create an account with us. We will only use personal information provided in a verifiable request to verify the requester's identity or authority to make the request.

## Response Timing and Format

We will attempt to respond to a verifiable request within 45 days of its receipt. If we require more time, we will inform you in writing of the reason and extension period. Any disclosure we provide will only cover the 12- month period preceding our receipt of the verifiable request. The response we provide will also explain the reason(s) we cannot comply with a request, if applicable. For data portability requests, we will select a format to ensure your personal information is readily useable and should allow you to transmit the information from one entity to another entity without hindrance. We do not charge to process or respond to your verifiable request unless it is excessive, repetitive, or manifestly unfounded. If we determine that a request warrants a monetary charge, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

## NON-DISCRIMINATION

We will not discriminate against you for exercising any CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you products or services;
- Charge you different prices or rates for products or services, including through granting discounts or other benefits; or imposing penalties;
- Provide you a different level or quality of product or service; or
- Suggest that you may receive a different price or rate for products or services or a different level or quality of products or services.

We may offer you certain financial incentives permitted by the CCPA, such as the opportunity to participate in a focus group for compensation. Any CCPA-permitted financial incentive we offer will reasonably relate to the value of your personal information and contain written terms that describe the program's material aspects.

Participation in a financial incentive requires your opt-in consent, which you may revoke at any time.

## CHANGES TO OUR CCPA PRIVACY NOTICE

MIT Federal Credit Union reserves the right to amend this CCPA privacy notice at our discretion and at any time. When we make changes to this CCPA privacy notice, we will post the updated notice on our Website and update the notice's effective date. Your continued use of our website or other facilities following posting of changes constitutes your acceptance of such changes.

## Contact Information

If you have any questions or comments about this notice, the ways in which MIT Federal Credit Union collects and uses your information, your choices and rights regarding such use, or wish to make a CCPA request, please do not hesitate to contact us at:

- Calling us at **617-253-2845** or toll-free at **855-MIT-CU4U** (855-648-2848)
- Visiting [www.mitfcu.org/CCPA](http://www.mitfcu.org/CCPA); or
- Visiting a MIT Federal Credit Union branch

If you have a disability that makes it difficult to contact us at the above toll-free number to access the notice in an alternative format. If you wish to print a copy of this policy it is available as a searchable PDF document at [www.mitfcu.org/CCPA](http://www.mitfcu.org/CCPA).