



CALIFORNIA CONSUMER PRIVACY ACT (CCPA)/ CALIFORNIA PRIVACY RIGHTS ACT (CPRA) POLICY

Last Updated and Effective: 06/13/2024

Overview:

Your privacy is important to us. This California Consumer Privacy Act (“CCPA”)/ California Privacy Rights Act (“CPRA”) explains how we collect, retain, process, and share your personal information through your online and offline interactions with us.

For California residents, this Privacy Policy (“Privacy Policy”) is adopted in accordance with the California Consumer Privacy Act of 2018 (“CCPA”), California Privacy Rights Act (CPRA), and the California Online Privacy Protection Act (“CalOPPA”), and any terms defined in the CCPA, CPRA, and CalOPPA have the same meaning when used in this Privacy Policy.

This Privacy Policy also includes references and links to our other privacy policies which serve different purposes under various laws and regulations that apply to us.

This Privacy Policy also covers the privacy practices of the Credit Union’s call center, branch locations, and related sites (collectively, “Operations”). By accessing any of our Websites, you acknowledge and consent to the practices set forth in the Credit Union’s Privacy Policy.

Information We May Collect:

When visiting our Websites or being served by our Operations, you may be asked to provide your personal information and sensitive personal information in order to apply for one of our products/services or access our online/mobile banking applications. The information that you provide may include your name, email address, physical address, phone number, tax identification number, date of birth, and other unique identifiers.

Protecting Your Information:

The Credit Union respects your right to privacy and recognizes the importance of protecting your personal information and sensitive personal information. To that end, we maintain administrative, technical, and physical safeguards which comply with applicable federal and state laws that govern the privacy and security of such information.

I. COMPLIANCE STATEMENTS

California Online Privacy Protection Act – Statement of Compliance: Pursuant to the California Online Privacy Protection Act, we offer several ways to review and update your information. Online users may log onto our banking platform and select the “My Settings” tab. You may also review and update your information by calling 888-883-7228, writing to P.O. Box 908, Riverside, CA, 92502, or visiting your local Credit Union branch.

Children’s Online Privacy Protection Act – Statement of Compliance: We do not knowingly collect personally identifiable information from individuals under the age of 13 through our Websites or mobile banking application without obtaining verifiable consent from their parents. Additional information about the Children’s Online Privacy Protection Act is available at the Federal Trade Commission’s website: www.ftc.gov.

California Privacy Rights Act / California Consumer Privacy Act – Statement of Compliance: Description of Your Rights: The California Privacy Rights Act (“CPRA”) / California Consumer Privacy Act (“CCPA”) confer statutory rights that provide California consumers with greater control and transparency over the use of their personal information and sensitive personal information by affected companies operating within this state. These statutory rights include, among other things, the protections listed below. You may submit verifiable consumer requests, obtain additional information about these protections, and direct any questions to the Credit Union by email, via telephone, or in writing to OCEANAIR Federal Credit Union. Upon receipt of a verifiable consumer request for disclosures covered under CCPA

/ CPRA, including those seeking the correction of inaccurate personal information and the deletion of a consumer’s personal information, the Credit Union shall take the necessary steps and respond to you within the following 45 days; this time period may be extended once by an additional 45 days when reasonably necessary, as permitted by statute, and we will notify you of the extension within the original 45 day period.

- Right to Request and Receive Personal Information Disclosures under CCPA / CPRA (California Civil Code § 1798.100)

Under CCPA / CPRA, a business that controls the collection of your personal information must, at or before the point of collection, inform you about: (1) the categories of personal information to be collected and the purposes for which the categories of personal information are collected or used, and whether such personal information is sold or shared; (2) the categories of sensitive personal information to be collected and the purposes for which the categories of sensitive personal information are collected or used, and whether such information is sold or shared; and (3) the length of time the business intends to retain each category of personal information and sensitive personal information, provided that such information is not retained for longer than is reasonably necessary for the disclosed purpose for which the information was collected.

- Right to Delete Personal Information under CCPA / CPRA (California Civil Code § 1798.105)

Under CCPA / CPRA, you have the right to request the deletion of personal information that a business has collected from you. A business that collects personal information about consumers must disclose the right of consumers to request the deletion of their personal information. Accordingly, a business that receives a verifiable consumer request for deletion must delete your personal information from its records and direct any service providers to delete your personal information from their records. Certain exceptions apply to these requests. A business or a service provider is not required to comply with your request to delete your personal information if it is reasonably necessary for the business or service provider to maintain your personal information in order to: (1) complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service that you requested, or reasonably anticipated by the consumer within the context of a business’s ongoing business relationship with you, or otherwise perform a contract between the business and you; (2) help to ensure security and integrity to the extent that the use of your personal information is reasonably necessary and proportionate for those purposes; (3) debug to identify and repair errors that impair existing intended functionality; (4) exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law; (5) comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the California Penal Code; (6) engage in public or peer-reviewed scientific, historical, or statistical research that adheres to all other applicable ethics and privacy laws, when the deletion of your information is likely to render impossible or seriously impair the ability to complete such research, if you have provided informed consent; (7) to enable solely internal uses that are reasonably aligned with your expectations based on your relationship with the business and compatible with the context in which you provided the information; or (8) comply with a legal obligation.

- Right to Correct Inaccurate Personal Information under CCPA / CPRA (California Civil Code § 1798.106)

Under CCPA / CPRA, you have the right to request the correction of any inaccurate personal information, considering the nature of the personal information and the purposes of the processing of the personal information. Upon receiving a verifiable consumer request to correct inaccurate personal information, we shall use commercially reasonable efforts to make any necessary correction(s), as directed by the consumer.

- Right to Know what Personal Information is Being Collected and Right to Access Personal Information (California Civil Code § 1798.110)

Under CCPA / CPRA, you have the right to request that a business that collects your personal information disclose the following information: (1) the categories of personal information it has collected about consumers; (2) the categories of sources from which the personal information is collected; (3) the business or commercial purpose for collecting, selling, or sharing personal information; (4) the categories of third parties to whom the business discloses personal information; and (5) the specific pieces of personal information it has collected about you. A business that collects your personal information must disclose, pursuant to paragraph (3) of subdivision (a) of California Civil Code § 1798.130, the information cited above upon receipt of a verifiable consumer request. A business that collects your personal information must disclose, pursuant to subparagraph (B) of paragraph (5) of subdivision (a) of California Civil Code § 1798.130 the information cited above.

- Right to Know what Personal Information is Sold or Shared, and to Whom (California Civil Code § 1798.115)

Under CCPA / CPRA, you have the right to request that a business that sells your personal information, shares your personal information, or discloses it for a business purpose, inform you of: (1) the categories of personal information that the business collected about you; (2) the categories of personal information that the business sold or shared about you and the categories of third parties to whom the personal information was sold or shared; and (3) the categories of personal information that the business disclosed about you for a business purpose, and the categories of persons to whom it was disclosed for a business purpose. A business that sells or shares your personal information, or that discloses your personal information for a business purpose, must disclose, pursuant to paragraph (4) of subdivision (a) of California Civil Code § 1798.130, the information cited above upon receipt of a verifiable consumer request. A business that sells or shares your personal information, or that discloses your personal information for a business purpose, must disclose, pursuant to subparagraph (C) of paragraph (5) of subdivision (a) of California Civil Code § 1798.130: (1) the category or categories of consumers' personal information it has sold or shared, or if the business has not sold consumers' personal information, it must disclose that fact; and (2) the category or categories of consumers' personal information it has disclosed for a business purpose, or if the business has not disclosed the consumers' personal information for a business purpose, it must disclose that fact. Under CCPA / CPRA, a third party is prohibited from selling personal information about a consumer that has been sold to the third party by a business unless the consumer has received explicit notice and is provided an opportunity to exercise the right to opt-out pursuant to California Civil Code § 1798.120. Please note that the Credit Union does not sell your personal information and sensitive personal information.

- Right to Opt-Out of the Sale or Sharing of Personal Information

Under CCPA / CPRA, you have the right, at any time, to direct a business that sells or shares your personal information, not to sell or share your personal information. This right may be referred to as the "Right to Opt-Out of Sale or Sharing." If a business has received direction unless or share your personal information, the business is prohibited from selling or sharing your personal information after its receipt of your direction, unless you subsequently provide your consent to sell or share your personal information. In the case of a minor consumer, the business is prohibited from selling or sharing the minor's personal information if it has not received consent to do so.

- Right to Limit Use and Disclosure of Sensitive Personal Information under CCPA / CPRA (California Civil Code § 1798.121)

Under CCPA / CPRA, you have the right, at any time, to direct a business that collects sensitive personal information about the consumer to limit its use of the consumer's sensitive personal information to the use(s) necessary to: (1) perform the services or provide the goods reasonably expected by an average consumer who requests such goods or services; (2) effectuate the business purpose of helping to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for that purpose; (3) meet the business purpose of short-term and transient use, including, but not limited to non-personalized advertising shown as part of your current interaction with the Credit Union; (4) fulfill the business purpose for the Credit Union's performance services, including maintaining or servicing your account, providing customer service, processing or fulfilling orders or transactions, verifying your customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services; and (5) achieve the business purpose of undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the Credit Union, and to improve, upgrade, or enhance the service or device owned, manufactured, manufactured for, or controlled by the Credit Union.

- Right of Non-Retaliation Following Opt-Out of Exercise of Other Rights under CCPA / CPRA (California Civil Code § 1798.125)

Under CCPA / CPRA, a business must not discriminate against you because you exercised any of your rights under the CCPA / CPRA; these prohibited discriminatory acts include, and are not limited to: (1) denying goods or services to you; (2) charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; (3) providing a different level or quality of goods or services to you; (4) suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services; and (5) retaliating against an employee, applicant for employment, or independent contractor for exercising their rights under CCPA / CPRA.

II. CATEGORIES OF INFORMATION WE COLLECT

In the preceding 12-months, we may have collected the following categories of personal information: (Examples are used for reference and does not mean we collect all types of data about you.)

Category	Examples – Used as reference
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; 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, race, color, ancestry, national origin, citizenship, marital status, sex, veteran or military status.
C. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
D. Biometric information	Fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns.
E. Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
F. Geolocation data	Physical location or movements. For example, city, state, country, and ZIP code associated with your IP address or derived through Wi-Fi triangulation; and, with your permission in accordance with your mobile device settings, and precise geolocation information from GPS-based functionality on your mobile devices.
G. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.
H. Professional or employment-related information.	This information relates to the Credit Union's current, former, and prospective employees. 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 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.
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)).	This information relates to the Credit Union's current, former, and prospective employees. Educational records 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.
J. Inferences drawn from other personal information	Profile reflecting a person's preference, characteristics, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

III. CATEGORIES OF SOURCES OF INFORMATION WE COLLECT

We may obtain the categories of personal information listed above from one or more of the following categories of sources:

a. From You or Your Authorized Agent

We may collect information directly from you or your authorized agent. For example, when you provide us with your name and Social Security number to open an account and become a member. We also collect information indirectly from you or your authorized agent. For example, through information we collect from our members in the course of providing services to them.

b. From Our Website and Applications That You Access on Your Mobile Device

We collect certain information from your activity on our website and your use of applications on your mobile device. We may collect your IP address, device and advertising identifiers, browser type, operating system, Internet service provider (“ISP”), pages that you visit before and after visiting our website, the date and time of your visit, information about the links you click and pages you view on our website, and other standard server log information. We may also collect your mobile device’s GPS signal, or other information about nearby Wi-Fi access points and cell towers.

i. The Role of Cookies and Other Online Tracking Technologies

We, or our service providers, and other companies we work with may deploy and use cookies, web beacons, local shared objects and other tracking technologies for various purposes, such as fraud prevention and to promote our products and services to you. Some of these tracking tools may detect characteristics or settings of the specific device you use to access our online services.

“Cookies” are small amounts of data a website can send to a visitor’s web browser. They are often stored on the device you are using to help track your areas of interest. Cookies may also enable us or our service providers and other companies we work with to relate your use of our online services over time to customize your experience. Most web browsers allow you to adjust your browser settings to decline or delete cookies, but doing so may degrade your experience with our online services.

Clear GIFs, pixel tags or web beacons—which are typically one-pixel, transparent images located on a webpage or in an email or other message—or similar technologies may be used on our sites and in some of our digital communications (such as email or other marketing messages). They may also be used when you are served advertisements, or you otherwise interact with advertisements outside of our online services. These are principally used to help recognize users, assess traffic patterns and measure site or campaign engagement.

Local Shared Objects, sometimes referred to as “flash cookies” may be stored on your hard drive using a media player or other software installed on your device. Local Shared Objects are similar to cookies in terms of their operation but may not be managed in your browser in the same way.

“First party” cookies are stored by the domain (website) you are visiting directly. They allow the website’s owner to collect analytics data, remember language settings, and perform useful functions that help provide a good experience. “Third-party” cookies are created by domains other than the one you are visiting directly, hence the name third-party. They may be used for cross-site tracking, retargeting and ad- serving. We also believe that cookies fall into the following general categories:

- **Essential Cookies:** These cookies are technically necessary to provide website functionality. They are a website’s basic form of memory, used to store the preferences selected by a user on a given site. As the name implies, they are essential to a website’s functionality and cannot be disabled by users. For example,

an essential cookie may be used to prevent users from having to log in each time they visit a new page in the same session.

- **Performance and Function Cookies:** These cookies are used to enhance the performance and functionality of a website but are not essential to its use. However, without these cookies, certain functions (like videos) may become unavailable.
- **Analytics and Customization Cookies:** Analytics and customization cookies track user activity, so that website owners can better understand how their site is being accessed and used.
- **Advertising Cookies:** Advertising cookies are used to customize a user's ad experience on a website. Using the data collected from these cookies, websites can prevent the same ad from appearing repeatedly, remember user ad preferences, and tailor which ads appear based on a user's online activities.

ii. Online Advertising & Online Behavioral Advertising

You may see advertisements when you use our online services. These advertisements will be for our own products or services (including pre-screened offers of credit). Which advertisements you see on our online services is often determined using the information we or our affiliates, service providers and other companies that we work with have about you, including information about your relationships with us (e.g., types of accounts held, transactional information, location of banking activity). To that end, where permitted by applicable law, we may share with others the information we collect from and about you.

Online behavioral advertising (also known as "OBA" or "interest-based advertising") refers to the practice of collecting information from a computer or device regarding a visitor's web-browsing activities across non-affiliated websites over time in order to deliver advertisements that may be of interest to that visitor based on their browsing history. We use online behavioral advertising in compliance with data privacy laws.

Our advertising service providers may deliver our advertisements to you on non-affiliated websites. Such service providers control the manner in which the advertisements are delivered to you on such non-affiliated websites. You should generally be able to opt out of receiving such advertisements from the service provider responsible for delivering the advertisement. Please contact us if you have any difficulty doing so.

c. Third-party service providers in connection with our services or 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. Another example is a third-party service provider that provides us information to help us detect security incidents and fraudulent activity.

d. Information we collect from third parties for a commercial purpose

We collect information from third parties for our commercial purposes. We partner with a limited number of third-party analytics and advertising firms. These third parties may use cookies or code processed by your browser to collect public information about your visits to our and other websites in order to provide customized experiences, advertisements or services. These parties may also collect information directly from you by contacting you telephonically, via email or through other communication channels. We do not disclose any information about you to such third parties except as permitted by applicable laws and regulations, and we require such third parties to follow applicable laws and regulations when they collect information from you to transfer such information to us.

IV. HOW WE USE YOUR PERSONAL INFORMATION

We may use or disclose 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 a loan, and we use the information in your loan application to give you the loan.
- To provide you with information, products or services that you request from us.
- To evaluate your candidacy for employment or for an independent contractor engagement, and to administer employment-related benefits for you, your spouse or domestic partner, and your dependents.
- To provide you with email alerts, event registrations or other notices concerning our products or services, or events or news, which 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.
- 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, protect 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.
- As described to you when collecting your personal information.
- 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.

V. SHARING PERSONAL INFORMATION

We may disclose your personal information to a third parties for our business purposes. The general categories of third parties that we share with are as follows:

1. Our third-party service providers;
2. Our affiliated websites and businesses in an effort to bring you improved service across our family of products and services, when permissible under relevant laws and regulations
3. Other companies to bring you co-branded services, products or programs;
4. Third parties that help us advertise products, services or membership with us to you;
5. Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you;
6. Third parties or affiliates in connection with a corporate transaction, such as a sale, consolidation or merger of our financial institution or affiliated business; and
7. Other third parties to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights, or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise, to protect the rights, property or security of our customers or third parties.

In the preceding 12-months, we 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 I)	Category of Third Parties (Represented in numerical form from the categories of third-parties identified in this Section IV)
A	1, 2, 3, 4, 5, 6, 7
B	1, 2, 3, 4, 5, 6, 7
C	1, 2, 3, 4, 5, 6, 7
D	1, 5, 7
E	1, 2, 3, 4, 5, 6, 7
F	1, 2, 3, 6, 7
G	1, 2, 3, 4, 5, 6, 7
H	1, 2, 5, 6, 7
I	1, 2, 5, 6, 7
J	1, 2, 3, 4, 5, 6, 7

VI. SELLING PERSONAL INFORMATION

We do not sell your personal information for monetary or other valuable consideration. We have not sold your personal information within the preceding 12 months.

We do not have actual knowledge of selling personal information of minors under 16 years of age.

VII. RIGHTS AND CHOICES FOR CALIFORNIA RESIDENTS

If you are a California resident, this section describes your rights and choices regarding how we collect, share, use, and protect your personal information, how to exercise those rights, and limits and exceptions to your rights and choices under the CCPA.

a. Exceptions

In the following instances, the rights and choices in this Section VI do not apply to you:

- If you are not a California resident.
- If we collected personal information covered by certain financial 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. How we collect, share, use and protect your personal information covered under the GLBA, FIPA, or is covered under our Federal [GLBA Privacy Policy](#) and/or our California notice, [Important Privacy Choices for Consumers](#).

- Aggregate consumer information.
- Deidentified personal information.
- Publicly available information.

b. Access to Specific Information and Data Portability Rights

If the above exceptions do not apply, and you have not made this request more than twice in a 12-month period, you have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months from the date we receive your request. Once we receive and confirm your request and verify that the request is coming from you or someone authorized to make the request on your behalf, we will disclose to you or your representative:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties to whom we sold or disclosed the category of personal information for a business or commercial purpose.
- The business or commercial purpose for which we sold or disclosed the category of personal information.
- The specific pieces of personal information we collected about you in a form that you can take with you (also called a “data portability request”).

c. Deletion Request Rights

You have the right to request that we delete any of your personal information that we collect from you and retain, subject to certain exceptions. Once we receive and verify your request, 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 providers to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
3. Debug to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
5. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the businesses’ deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you previously provided informed consent.
6. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
7. Comply with a legal obligation.
8. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

d. Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, a consumer or a consumer's authorized agent may submit a verifiable consumer request to us by either:

- Calling us at 800.477.2890
- Online www.OceanAir.org/privacy
- Visiting one of our branch locations

In order to verify your identity, we may require that you provide government issued identification or other identity documentation or answer identity authentication questions.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period.

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

An authorized agent is any person or legal entity registered with the California Secretary of State that you have authorized to act on your behalf. If we receive a request through your authorized agent, we may require:

1. Submission of a written document signed by you with your permission for the authorized agent to submit a verifiable request on your behalf and require the authorized agent to verify its own identity to us; or
2. You to directly verify with us that you have provided the authorized agent to submit the request.
3. We will not require either of the above if your authorized agent provides a copy of a power of attorney pursuant to California Probate Code sections 4000 to 4465 and we are able to verify authorized agent's identity.

We will deny a request from an agent that does not submit proof that they have been authorized by you to act on your behalf and cannot verify their own identity to us.

e. Response Timing and Format

We will do our best to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We may provide notification through mail, email, or online response portal.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request.

f. Right of Non-Discrimination

We will not discriminate against you for exercising any of your rights in this Privacy Policy and under applicable laws. Unless permitted by law, we will not:

- Deny you goods or services.

- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you with a different level or quality of goods or services.
- Suggest that you may receive a different price for goods or services or a different level or quality of goods or services.

VIII. CHANGES TO OUR PRIVACY POLICY

We reserve the right to amend this Privacy Policy at our discretion and at any time, however, in the ordinary course of its business, the Credit Union will review (and update, if needed) this Privacy Policy on at least an annual basis. The current version bears the date that the Privacy Policy was last updated. Where updates are made to the Privacy Policy, your continued use of the Websites constitutes your acknowledgment and acceptance of those changes. When we make changes to this Privacy Policy, we will notify you by email or through a notice on our website homepage.

IX. CHILDREN’S ONLINE INFORMATION PRIVACY

Our website is not intended for children under the age of 13. We do not knowingly collect, maintain, or use personally identifiable information from our website about children under the age of 13 without parental consent. For more information about the Children’s Online Privacy Protection Act (COPPA), visit the Federal Trade Commission website: www.ftc.gov.

X. LINKING TO GO THIRD-PARTY WEBISTES

We may provide links to websites that are owned or operated by other companies ("third-party websites"). When you use a link online to visit a third-party website, you will be subject to that website’s privacy and security practices, which may differ from ours. You should familiarize yourself with the privacy policy, terms of use and security practices of the linked third-party website before providing any information on that website. We are not responsible for the third-party website’s use, collection, sale or sharing of your personal information.

XI. SECURITY

We use reasonable physical, electronic, and procedural safeguards that comply with federal standards to protect and limit access to personal information. This includes device safeguards and secured files and buildings.

Please note that information you send to us electronically may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential information (such as your Social Security number) to us.

XII. CONTACT INFORMATION

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights, please do not hesitate to contact us at:

Phone: 800-477-2890
 Website: www.OceanAir.org/contact
 Email: Compliance@OceanAir.org
 Mail: OceanAir
 Attn: Risk & Compliance
 2151 E Gonzales Rd
 Oxnard, CA 93036