

## California Consumer Privacy Policy

Last Updated December 30, 2022

This California Consumer Privacy Policy explains how Together Credit Union (referred to at times in this Policy as “Together,” “we,” “our,” and “us”), collects, uses, shares, and discloses certain personal information about California residents. This Policy also explains certain rights granted to California residents under the California Consumer Privacy Act (“CCPA”) that went into effect on January 1, 2020, as well as under the California Privacy Rights Act of 2020 (“CPRA”), which went/goes into effect on January 1, 2023, which expanded upon many of the rights granted under the CCPA. This Policy encompasses the duties and rights included in the CPRA.

The CCPA and CPRA provide California residents rights to, among other things, request that we: provide you lists of personal information that we collect about members (including specific items of data collected about you individually), explain how we use the personal information that we collect, delete certain personal information that we have collected about you, correct items of your personal information that are incorrect, or opt-out of sharing of your information for cross-context behavioral advertising. Under these Acts, we will also disclose to you certain items of this information without you asking (through this Policy). When we use the terms “Personal Information” and “Sensitive Personal Information” throughout this Policy, we mean them in the way those terms are defined under the CCPA and CPRA.

The rights provided under the CCPA and CPRA apply only to information about California residents. Additionally, they do not apply to information that we are already required to keep private under certain federal laws (for example, information protected under the Gramm-Leach-Bliley Act used in relation to us providing you financial products or services). Thus, the nature of how the rights provided by the CCPA and CPRA are applied (as explained further in this Policy) will depend on, among other things, the nature of our relationship with you, the types of information you have exchanged with us, and your state of residency.

### Collection and Disclosure of Personal Information

In the past 12 months, we have collected the following categories of Personal Information about California residents:

- Identifiers, such as real name, alias, postal address, unique personal identifier, online identifier, Internet protocol address, email address, account name, and government-issued identifier (e.g., Social Security Number, driver’s license number, passport number), member number, or other similar identifiers;
- Personal information, as defined by Cal. Civ. Code § 1798.80(e), which “means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual,” including but not limited to, his or her name, signature, identifying numbers (i.e. Social Security Number, state identification card number, driver’s license, etc.), physical characteristics or description, address, telephone number, insurance information, education, employment information, medical information, disability information, or financial information;
- Characteristics of protected classifications under California or federal law, such as sex/gender, marital status, race, national origin, military/veteran status, disability, request for employee leave, citizenship status, or age;
- Commercial information, such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies such as transaction information, auto loans, and purchase history, including, but not limited to, member tenure and the number of products or services a member partakes in;
- Internet or other electronic network activity information, such as browsing history, search history, or information relating to interactions with our website, applications, advertisements, and emails;

- Geolocation data, such as device location, device identifier, and Internet Protocol (IP) location;
- Audio, electronic, visual, and similar information, such as call and video recordings;
- Professional and employment-related information, such as work history and prior employer; and
- Education information.

In the past 12 months, we have collected the following categories of Sensitive Personal Information about California residents:

- Your social security, driver’s license, state identification card, or passport number;
- Your account log-in, financial account, debit card or credit card number in combination with any required security or access code, password, or credentials allowing access to an account;
- Your precise geolocation;
- Your racial or ethnic origin;
- Contents of your mail, email, and text messages we send to you or received from you;
- Medical history, limited to disability and/or insurance claims; and
- Information collected concerning employees’ health.

We collected such Personal Information and Sensitive Information from the following sources:

- Directly from California residents or their representatives;
- Service providers, consumer data resellers, and other third parties;
- Public record sources (federal, state, or local government sources);
- Website/mobile app activity/social media; and
- Institutions from consumer-directed third parties or institutions representing a consumer/prospect.

### **How we Use Personal Information**

In the past 12 months, we have collected, used, shared or disclosed (for business purposes) to third parties or persons Personal Information relating to California residents for one or more of the following business or commercial purposes:

- Performing services and offering products, including maintaining or servicing accounts, providing member service, processing transactions, providing financing or other financial services and associated activities;
- Engaging in advertising or marketing activities;
- Preventing, detecting, and responding to security incidents;
- Undertaking activities, including internal research and analysis, to derive consumer insights and to maintain or enhance the quality and/or safety of our products and services;
- Maintaining the integrity and the functionality of our information technology systems;
- Hiring and promoting employees as well as administering employment benefits;
- Responding to inquiries and fulfilling requests;
- Verifying your identity and account status;
- Informing you about important information regarding the Site, products or services for which you apply or may be interested in applying for, or in which you are already enrolled, including changes to terms, conditions, and policies and/or other administrative information;
- Delivering marketing communications that we believe may be of interest to you, including, ads or offers tailored to you;
- Personalizing your experience on any mobile or online Site or application that we own and operate, including, but not limited to, our website (togethercu.org) and our mobile app (collectively, “Sites”);

- Allowing you to apply for products or services (e.g., to apply for membership, prequalify for a mortgage, apply for a credit card, or to open a deposit account or other financial product) and evaluate your eligibility for such products or services;
- Verifying your identity, information, and/or location (or the identity or location of your representative or agent) in order to allow access to your accounts, conduct online transactions and to maintain measures aimed at preventing fraud and protecting the security of account and Personal Information;
- To provide security and integrity in the services or goods offered by us;
- Allowing you to participate in satisfaction surveys and other forms of market research, and to administer these activities;
- Allowing you to use some Site financial planning tools;
- For business purposes, including data analysis, audits, developing and improving products and services, enhancing the Site, identifying usage trends and determining the effectiveness of promotional campaigns;
- For risk control, for fraud detection and prevention, to comply with laws and regulations, and to comply with other legal process and law enforcement requirements; and
- Allowing you to utilize features within our Sites by granting us access to information from your device such as geo-location when you request certain services.

In the past 12 months, we have collected, used, shared, or disclosed to third parties or persons Sensitive Personal Information relating to California residents for one or more of the following business or commercial purposes:

- Performing services and offering products, including maintaining or servicing accounts, providing member service, processing transactions, providing financing or other financial services and associated activities;
- Hiring and promoting employees and administering employment benefits;
- Verifying your identity and account status;
- Responding to your inquiries and fulfilling your requests;
- Allowing you to apply for products or services (e.g., to apply for membership, prequalify for a mortgage, apply for a credit card, or to open a deposit account or other financial product) and evaluate your eligibility for such products or services;
- Verifying your identity, information, and/or location (or the identity or location of your representative or agent) in order to allow access to your accounts, conduct online transactions and to maintain measures aimed at preventing fraud and protecting the security of account and Personal Information;
- To provide security and integrity in the services or goods offered by us;
- For business purposes, including data analysis, audits, developing and improving products and services, enhancing the Site, identifying usage trends and determining the effectiveness of promotional campaigns;
- For risk control, for fraud detection and prevention, to comply with laws and regulations, and to comply with other legal process and law enforcement requirements; and
- Allowing you to utilize features within our Sites by granting us access to information from your device such as geo-location when you request certain services.

### **Sale, Sharing, or Disclosure of Personal Information and Opting-Out**

It is not Together's policy to sell Personal Information, and we have not sold Personal Information in the past 12 months. Together Credit Union does not sell the Personal Information of consumers under 16 years of age.

Together Credit Union does share with third parties some of the Personal Information that it collects. If you wish to opt-out of the sharing of your Personal Information, you can (1) call our toll-free number at 1-800-320-0462, or (2) locating the "Do Not Share My Personal Information" link which may be found on the Together Credit Union homepage at [togethercu.org](http://togethercu.org) under the link at the bottom of the page titled "Privacy Choices for CA

Residences,” and print the form, or obtain a hard copy from any California branch location, and submit the completed form under the CCPA/CPRA via mail to us at—Together Credit Union, Attention: Compliance Department, 423 Lynch Street, Saint Louis, MO 63118; or (3) print the form at the previously mentioned link or obtain a hard copy from any California branch location and submit a completed request to opt-out in person at any of our California branches. All these methods will request you give your name and address in order to assess and process your opt-out request. Any information collected will be used in accordance with the CCPA and the CPRA.

The tables below show, for each category of Personal Information or Sensitive Personal Information we have collected, the categories of third parties or persons to whom we have (1) shared such information (we have not shared Sensitive Personal Information), or (2) disclosed such information for business purposes. Specifically, we currently share/disclose (and in the past 12 months have shared/disclosed) the following categories of Personal Information and Sensitive Personal Information:

<b>Categories of Personal Information (Not Necessarily Including All Information within Each Category) Shared within Last 12 Months</b>	<b>Categories of Third Parties to which it was Shared</b>
Identifiers, such as real name, alias, postal address, unique personal identifier, online identifier, Internet protocol address, email address, account name, and government-issued identifier (e.g., Social Security Number, driver’s license number, passport number), member number, or other similar identifiers.	Vendors and Service Providers
Personal information, as defined by Cal. Civ. Code § 1798.80(e), which “means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual,” including but not limited to, his or her name, signature, identifying numbers (i.e. Social Security Number, state identification card number, driver’s license, etc.), physical characteristics or description, address, telephone number, insurance information, education, employment information, medical information, disability information, or financial information.	Vendors and Service Providers
Commercial information, such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies such as transaction information, auto loans, and purchase history, including, but not limited to, member tenure and the number of products or services a member partakes in.	Vendor and Service Providers

<b>Categories of Personal Information/Sensitive Personal Information Disclosed for a Business Purpose within Last 12 Months</b>	<b>Categories of Third Parties and/or Persons to which it was Disclosed</b>
Identifiers, such as real name, alias, postal address, unique personal identifier, online identifier, Internet protocol address, email address, account name, and government-issued identifier (e.g., Social Security Number, driver's license number, passport number), member number, or other similar identifiers.	Vendors and Service Providers; Government Entities
Personal information, as defined by Cal. Civ. Code § 1798.80(e), which "means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual," including but not limited to, his or her name, signature, identifying numbers (i.e. Social Security Number, state identification card number, driver's license, etc.), physical characteristics or description, address, telephone number, insurance information, education, employment information, medical information, disability information, or financial information.	Vendors and Service Providers; Government Entities
Characteristics of protected classifications under California or federal law, such as sex/gender, marital status, race, national origin, military/veteran status, disability, request for employee leave, citizenship status, or age.	Vendor and Service Providers
Commercial information, such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies such as transaction information, auto loans, and purchase history, including, but not limited to, member tenure and the number of products or services a member partakes in.	Vendor and Service Providers
Internet or other electronic network activity information, such as browsing history, search history, information relating to interactions with our website, applications, advertisements, and emails.	Vendor and Service Providers
Geolocation data, such as device location, device identifier, and Internet Protocol (IP) location.	Vendor and Service Providers
Audio, electronic, visual, and similar information, such as call and video recordings.	Vendor and Service Providers
Professional and employment-related information, such as work history and prior employer.	Vendors and Service Providers
Education information.	(For Employees Only) Vendors and Service Providers

Your social security, driver's license, state identification card, or passport number.	Vendors and Service Providers; Government entities.
Your account log-in, financial account, debit card or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.	Vendors and Service Providers.
Your precise geolocation.	Vendors and Service Providers.
Your racial or ethnic origin.	Government entities.
Contents of your mail, email, and text messages we send to you or received from you.	Government entities.
Medical history, limited to disability and/or insurance claims.	(For Employees Only) Vendors and Service Providers; Government entities. .
Information collected concerning employees' health.	(For Employees Only) Vendors and Service Providers; Government entities.

### How Long we Keep Personal Information

<b>Categories of Personal Information/Sensitive Personal Information Collected within Last 12 Months</b>	<b>Criteria for Retention of/Length of Time for Keeping Personal Information/Sensitive Personal Information</b>
Identifiers, such as real name, alias, postal address, unique personal identifier, online identifier, Internet protocol address, email address, account name, and government-issued identifier (e.g., Social Security Number, driver's license number, passport number), member number, or other similar identifiers.	Due to the various documents, forms, locations, etc. in which we use your information, in order to perform financial and tangential services, or employee related items, this information is retained in accordance with various laws and depends entirely on your relationship with us. We do not intend to retain Personal Information or Sensitive Personal Information longer than is legally and contractually required.
Personal information, as defined by Cal. Civ. Code § 1798.80(e), which "means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual," including but not limited to, his or her name, signature, identifying numbers (i.e. Social Security Number, state identification card number, driver's license, etc.), physical characteristics or description, address, telephone number, insurance information, education, employment information, medical information, disability information, or financial information.	Due to the various documents, forms, locations, etc. in which we use your information, in order to perform financial and tangential services, or employee related items, this information is retained in accordance with various laws and depends entirely on your relationship with us. We do not intend to retain Personal Information or Sensitive Personal Information longer than is legally and contractually required.
Characteristics of protected classifications under California or federal law, such as sex/gender, marital status, race, national origin, military/veteran status, disability, request for employee leave, citizenship status, or age.	Due to the various documents, forms, locations, etc. in which we use your information, in order to perform financial and tangential services, or employee related items, this information is retained in accordance with various laws and depends entirely on your relationship with us. We do not intend to retain Personal Information or Sensitive Personal Information longer than is legally and contractually required.

<p>Commercial information, such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies such as transaction information, auto loans, and purchase history, including, but not limited to, member tenure and the number of products or services a member partakes in.</p>	<p>Due to the various documents, forms, locations, etc. in which we use your information, in order to perform financial and tangential services, or employee related items, this information is retained in accordance with various laws and depends entirely on your relationship with us. We do not intend to retain Personal Information or Sensitive Personal Information longer than is legally and contractually required.</p>
<p>Internet or other electronic network activity information, such as browsing history, search history, information relating to interactions with our website, applications, advertisements, and emails.</p>	<p>Due to the various documents, forms, locations, etc. in which we use your information, in order to perform financial and tangential services, or employee related items, this information is retained in accordance with various laws and depends entirely on your relationship with us. We do not intend to retain Personal Information or Sensitive Personal Information longer than is legally and contractually required.</p>
<p>Geolocation data, such as device location, device identifier, and Internet Protocol (IP) location.</p>	<p>Due to the various documents, forms, locations, etc. in which we use your information, in order to perform financial and tangential services, or employee related items, this information is retained in accordance with various laws and depends entirely on your relationship with us. We do not intend to retain Personal Information or Sensitive Personal Information longer than is legally and contractually required.</p>
<p>Audio, electronic, visual, and similar information, such as call and video recordings.</p>	<p>Due to the various documents, forms, locations, etc. in which we use your information, in order to perform financial and tangential services, or employee related items, this information is retained in accordance with various laws and depends entirely on your relationship with us. We do not intend to retain Personal Information or Sensitive Personal Information longer than is legally and contractually required.</p>
<p>Professional and employment-related information, such as work history and prior employer.</p>	<p>Due to the various documents, forms, locations, etc. in which we use your information, in order to perform financial and tangential services, or employee related items, this information is retained in accordance with various laws and depends entirely on your relationship with us. We do not intend to retain Personal Information or Sensitive Personal Information longer than is legally and contractually required.</p>
<p>Education information.</p>	<p>Due to the various documents, forms, locations, etc. in which we use your information, in order to perform financial and tangential services, or employee related items, this information is retained in accordance with various laws and depends entirely on your relationship with us. We do not intend to retain Personal Information or Sensitive Personal Information longer than is legally and contractually required.</p>

Your social security, driver's license, state identification card, or passport number.	Due to the various documents, forms, locations, etc. in which we use your information, in order to perform financial and tangential services, or employee related items, this information is retained in accordance with various laws and depends entirely on your relationship with us. We do not intend to retain Personal Information or Sensitive Personal Information longer than is legally and contractually required.
Your account log-in, financial account, debit card or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.	Due to the various documents, forms, locations, etc. in which we use your information, in order to perform financial and tangential services, or employee related items, this information is retained in accordance with various laws and depends entirely on your relationship with us. We do not intend to retain Personal Information or Sensitive Personal Information longer than is legally and contractually required.
Your precise geolocation.	Due to the various documents, forms, locations, etc. in which we use your information, in order to perform financial and tangential services, or employee related items, this information is retained in accordance with various laws and depends entirely on your relationship with us. We do not intend to retain Personal Information or Sensitive Personal Information longer than is legally and contractually required.
Your racial or ethnic origin.	Due to the various documents, forms, locations, etc. in which we use your information, in order to perform financial and tangential services, or employee related items, this information is retained in accordance with various laws and depends entirely on your relationship with us. We do not intend to retain Personal Information or Sensitive Personal Information longer than is legally and contractually required.
Contents of your mail, email, and text messages we send to you or received from you.	Due to the various documents, forms, locations, etc. in which we use your information, in order to perform financial and tangential services, or employee related items, this information is retained in accordance with various laws and depends entirely on your relationship with us. We do not intend to retain Personal Information or Sensitive Personal Information longer than is legally and contractually required.
Medical history, limited to disability and/or insurance claims.	Due to the various documents, forms, locations, etc. in which we use your information, in order to perform financial and tangential services, or employee related items, this information is retained in accordance with various laws and depends entirely on your relationship with us. We do not intend to retain Personal Information or Sensitive Personal Information longer than is legally and contractually required.



Information collected concerning employees' health.	Due to the various documents, forms, locations, etc. in which we use your information, in order to perform financial and tangential services, or employee related items, this information is retained in accordance with various laws and depends entirely on your relationship with us. We do not intend to retain Personal Information or Sensitive Personal Information longer than is legally and contractually required.
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## Rights Under the CCPA and CPRA

If you are a California resident, you have the right to:

1. Request that we disclose to you the following information covering the 12 months preceding your request (or earlier to the extent required by California regulations) (“Request to Know”):

- the categories of Personal Information that we collected about you and the categories of sources from which we collected such Information;
- the business or commercial purpose for collecting or sharing Personal Information about you;
- the categories of Personal Information about you that we shared to third parties or persons;
- the categories of Personal Information about you that we disclosed to third parties or persons for a business purpose;
- the categories of third parties or persons to whom we disclosed, for a business purpose, or with whom we shared such Personal Information; and
- the specific pieces of Personal Information we collected about you.

See below for information on how to submit this type of request. A Request to Know is a verifiable request. Please see below for a description of how we verify your Request to Know and what information must be provided from you for verification.

2. Request that we delete Personal Information that we collected about you, subject to applicable exceptions (“Request to Delete”). As stated above and in our Online Privacy Policy, we do not sell your Personal Information.

See below for information on how to submit this type of request. A Request to Delete is a verifiable request. Please see below for a description of how we verify your Request to Delete and what information must be provided from you for verification.

3. Request that we correct inaccurate Personal Information that we maintain (“Request to Correct”).

See below for information on how to submit this type of request. A Request to Correct is a verifiable request. Please see below for a description of how we verify your Request to Correct and what information must be provided from you for verification.

4. Request to “opt-out” of having your Personal Information shared (i.e., direct us not to share your Personal Information that we collect with third parties for advertising) (“Request to Opt-Out of Sharing”). The right to opt-out of the Sharing of Personal Information as permitted under the CCPA/CPRA, is for opting out for cross-context behavioral advertising. As noted above, Together Credit Union does not sell anyone’s personal information.

You can request to opt-out of sharing your Personal Information by, (1) calling our toll-free number at 1-800-320-0462, or (2) locating the “Do Not Share My Personal Information” link which may be found on the Together Credit Union homepage at [togethercu.org](http://togethercu.org) under the link at the bottom of the page titled “Privacy Choices for CA Residences,” and print the form, or obtain a hard copy from any California branch location, and submit the completed form under the CCPA/CPRA via mail to us at—Together Credit Union, Attention: Compliance Department, 423 Lynch Street, Saint Louis, MO 63118; or (3) print the form at the previously mentioned link or obtain a hard copy from any California branch location and submit a completed request to opt-out in person at any of our California branches. All these methods will request you give your name and address in order to assess and process your opt-out request. Any information collected will be used in accordance with the CCPA and the CPRA. If you are opting-out of sharing on behalf of another, see the below sections on authorized agents and minors as additional forms will be needed.

5. Request to “opt-in” to having your Personal Information shared with third parties for advertising (“request to Opt-In to Sharing”). As noted above, Together does not sell anyone’s Personal Information. You can request to opt-in to sharing your Personal Information by, (1) calling our toll-free number at 1-800-320-0462, or (2) locating the “CCPA/CPRA Opt In to Sharing” link which may be found on the Together Credit Union homepage at [togethercu.org](http://togethercu.org) under the link at the bottom of the page titled “Privacy Choices for CA Residences,” and print the form, or obtain a hard copy from any California branch location, and submit the completed form under the CCPA/CPRA via mail to us at—Together Credit Union, Attention: Compliance Department, 423 Lynch Street, Saint Louis, MO 63118; or (3) print the form at the previously mentioned link or obtain a hard copy from any California branch location and submit a completed request to opt-in in person at any of our California branches. All these methods will request you give your name and address in order to assess and process your opt-in request. Any information collected will be used in accordance with the CCPA and the CPRA. If you are opting-out of sharing on behalf of another, see the below sections on authorized agents and minors as additional forms will be needed. You may always opt-out of sharing your Personal Information, as discussed throughout this policy, at any time.

6. Be free from unlawful discrimination or retaliation for exercising your rights under the CCPA.

### **Minors under 16 Years**

Although Together does not sell the Personal Information or Sensitive Personal Information of anyone, including minors, Together shares and/or discloses personal information of consumers, including those under the age of 16 years, for business or commercial purposes, including facilitating services, and for cross-context behavioral advertising. In order to ensure these minors’ privacy, Together Credit Union has devised the following methods for minors to opt-in to the sharing of their personal information for cross-context behavioral advertising.

For minors 13 years of age to less than 16 years of age, Together Credit Union requires such minors to opt-in to the sharing of their personal information by completing an Opt-In to Sharing My Personal Information form. Such form can be found on the Together Credit Union homepage at [togethercu.org](http://togethercu.org), under the link at the bottom of the page titled “Privacy Choices for CA Residences.” After completing the form to opt-in, a minor 13 years of age to less than 16 years of age will then be contacted to separately confirm their choice to opt-in. This two-step method helps to ensure proper affirmative authorization.

For minors under the age of 13, the parent or legal guardian of such minor must affirmatively authorize the sharing of said minor’s personal information. In order to affirmatively authorize opting-in, the parent or guardian must provide us with a Parent/Legal Guardian Authorization and Consent form in addition to the Opt-In to Sharing My Personal Information form. This form will request a statement under perjury that the individual acting on behalf of the child is in fact the parent/legal guardian. The Parent/Legal Guardian Authorization and Consent form is found at the link “Parent/Legal Guardian Authorization and Consent” which can be found on the Together Credit

Union homepage at [togethercu.org](http://togethercu.org), under the link at the bottom of the page titled “Privacy Choices for CA Residences.” Once completed, this consent form may be sent to us via mail to “Together Credit Union, Attention: Compliance Department, 423 Lynch Street, Saint Louis, Missouri 63118,” or by submitting a copy to any California branch location. Additionally, please include a certified copy of a birth certificate or legal document to provide proof of the status of parent/legal guardian with the consent form. All information collected will be used to facilitate the request and will be retained in accordance with the CCPA/CPRA. Note, if the parent/legal guardian is making a verified request, or a request to opt-out, on behalf of a minor under the age of 13, the Parent/Legal Guardian Authorization and Consent form will need to be completed and submitted with the required proof in the manner described herein.

In all minor opting-in situations, the Opt-In to Sharing My Personal Information form may be submitted to Together Credit Union by mailing a completed hard copy of the form found at the above link location to “Together Credit Union, Attention: Compliance Department, 423 Lynch Street, Saint Louis, Missouri 63118”; submitting a hard copy of the completed form at any California branch location; or calling our toll-free number at 1-800-320-0462. The opt-in form will request the contact information of the person and for confirmation that they are a minor. All information collected will be used to facilitate the request and will be retained in accordance with the CCPA/CPRA. A minor or a parent or guardian may opt-out of sharing for cross-context behavioral advertising at any time by completing a Do Not Share My Personal Information form as noted above.

### **Authorized Agents**

You also have the right to use an authorized agent to make a request under the CCPA/CPRA on your behalf. California residents who have a relationship with Together Credit Union may rely on a valid general power of attorney already on file that appoints the authorized agent as attorney-in-fact. California residents who do not have a valid general power of attorney already on file, or do not have a relationship with Together, must designate their authorized agent in any of the following ways:

1. Submitting a valid general power of attorney to Together by
  - Sending a hard copy in the mail to: Together Credit Union, Attention: Compliance Department, 423 Lynch Street, Saint Louis, MO 63118;
  - Bring a copy into any branch location.
2. Filing out the Limited Power of Attorney form, which can be found on the Together Credit Union homepage at [togethercu.org](http://togethercu.org), under the link at the bottom of the page titled “Privacy Choices for CA Residences” and submitting the completed Limited Power of Attorney form via:
  - Sending a hard copy of the form to us at: Together Credit Union, Attention: Compliance Department, 423 Lynch Street, Saint Louis, Missouri 63118; or
  - Bring a copy of the completed form into any branch location.

If an authorized agent is conducting a Request to Know/Delete/Correct on your behalf, and you do not have a valid general power of attorney, Together may require you, in addition to the above signed permission, to verify your own identity directly with Together and/or directly confirm with Together that you have provided such written permission for the person to act on your behalf.

Parents/legal guardians making requests on behalf of their minor children will need to complete the Parent/Guardian Authorization Form at the link “California Parent/Guardian Authorization and Consent” which can be found by visiting the Together Credit Union homepage at [togethercu.org](http://togethercu.org), under the link at the bottom of the page titled “Privacy Choices for CA Residences,” and include a certified copy of a birth certificate or legal document to provide proof of their status. Completed Parent/Legal Guardian Authorization and Consent forms may be submitted to Together via mailing a copy of the form and proof to “Together Credit Union, Attention:

Compliance Department, 423 Lynch Street, Saint Louis, Missouri 63118,” or by submitting it to any California branch location.

Any information we collect from your authorize agent or the parent/legal guardian of a minor will be used solely for purposes of processing the request and will not be further disclosed. We will retain such additional information only as long as is required under the CCPA/CPRA.

Authorized agents may make requests in the same manner as you would, as set forth throughout this privacy policy.

## **How to Make Requests**

If you are a California resident, you or your authorized agent can use the following methods to make the requests described above, free of charge.

- To Request to Opt-out of Sharing of Personal Information, locate the form at the link “Do Not Share My Personal Information” which can be found on the Together Credit Union homepage at [togethercu.org](http://togethercu.org), under the link at the bottom of the page titled “Privacy Choices for CA Residences.” This form can also be found at any California branch location. Then submit it via one of the methods below.
- To Request to Opt-In to Sharing of Personal Information, locate the form at the link “CCPA/CPRA Opt In to Sharing” which can be found on the Together Credit Union homepage at [togethercu.org](http://togethercu.org), under the link at the bottom of the page titled “Privacy Choices for CA Residences.” This form can also be found at any California branch location. Then submit it via one of the methods below.
- To make a Request to Know, a Request to Delete, or a Request to Correct, locate the form at the link “Make a Request Regarding Personal Information” which can be found on the Together Credit Union homepage at [togethercu.org](http://togethercu.org), under the link at the bottom of the page titled “Privacy Choices for CA Residences.” This form can also be found at any California branch location. Then submit it via one of the methods below.

Methods to Submit:

- Calling us toll-free at 1-800-320-0462.
- Mailing a completed form to Together Credit Union, Attention: Compliance Department, 423 Lynch Street, Saint Louis, MO 63118.
- Visiting any of our California branches to complete a form.

## **Verification Process**

Upon submission of your verified request, we will take steps to verify your identity and, if applicable, the authorized agent or parent/legal guardian. Those steps may vary, however, depending on your relationship with Together Credit Union and the intake method. We may ask that you provide the following information to identify yourself:

- Name, contact information, social security or individual tax identification number, date of birth;
- A copy of government issued photo ID (such as Driver’s license, State ID, or similar documents);
- Authorization for your agent to act on your behalf; and/or

- Anything else that is legally and ethically required for us to verify your identity and securely process your request.

When you make a request, we will attempt to match information that you provide with your request with other sources of similar information in our files to reasonably ensure you are who you say you are. Any additional information we collect from you to verify your identity will be used solely for purposes of verification and will not be further disclosed. We will retain such additional information only as long as is required under the CCPA/CPRA.

Further, in rare cases we may require you to visit a Together Credit Union branch or acknowledge your identity before a notary public. Our branch offices that provide notary services will do so free of charge.

## **Responses**

We will work to process all verified Requests to Know/Delete/Correct within forty-five (45) calendar days of receipt. We will notify you within ten (10) business days from receipt of such request to confirm receipt. If we need an extension in order to process your request, we will reach out to you before the end of that forty-five (45) day period. Further, all requests to opt-out will be processed within fifteen (15) business days from receipt. We will also attempt to process all requests to opt-in within fifteen (15) business days from receipt.

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 or confirm that the Personal Information that we maintain relates to you, or if we cannot verify that the requestor has the authority to make a request on behalf of another individual. Additionally, we may not honor your request where an exception applies, such as where the disclosure of Personal Information would adversely affect the rights and freedoms of another individual or where the Personal Information that we maintain about you is not subject to the CCPA/CPRA's rights.

We will advise you in our response if we are not able to honor your request. We will not provide Social Security Numbers, driver's license numbers or government-issued identification numbers, financial account numbers, healthcare or medical identification numbers (including insurance numbers), account passwords or security questions and answers. Further, Together will not provide any specific pieces of information if the disclosure presents the possibility of unauthorized access that could result in identity theft or fraud or unreasonable risk to data or systems and network security.

## **Contact for More Information**

For any questions or concerns regarding the CCPA, the CPRA, Together Credit Union's request process, or any other matter, please visit us at any branch location or call us at 1-800-320-0462.