



California Privacy Notice

Last Updated: March 2022

This Privacy Notice for California residents serves to inform California residents regarding Georgia's Own Credit Union (collectively, "Georgia's Own Credit Union," "we," "us," or "our") online and offline practices regarding the collection, use, disclosure, and sale of personal information and of the rights of consumers regarding their personal information. This policy applies solely to visitors, members, users, and others who reside in the State of California ("consumers" or "you"). This Privacy Notice applies to offline and online data collection by Georgia's Own Credit Union and includes data collected during your use of the website, <https://www.georgiasown.org> and other Georgia's Own Credit Union-related sites, applications, software, communications, capabilities and services ("Services") accessible on or by any top-level Georgia's Own Credit Union domain owned by us (each, a "Site" and collectively the "Sites"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA") and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

Information We Collect

We have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Type of Identifiers We Collect
Identifiers	First and last name, business address, unique personal identifier, online identifier, Internet Protocol address, email address, signatures, account ID and password.
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	A name, business address, telephone number, employment, employment history, credit card number, debit card number, or any other financial information.
Internet or other similar network activity	Browsing history and time, search history, information on a consumer's interaction with a website, application, or advertisement.
Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
Professional or employment-related information	Current or past job history or performance evaluations.

Inferences drawn from other personal information	Profile reflecting a person's preferences, behavior, attitudes, and social media account information.
--	---

Categories of Sources of Information We Collect

We obtain Personal Information from the following categories of sources:

- Directly from our members or their agents. For example, from applications or information that members input into our mobile app.
- Indirectly from our members or their agents. For example, through information we collect from our clients in the course of providing Services to them.
- Directly and indirectly from activity on our website (<https://www.georgiasown.org>). For example, from website usage details that are collected automatically. In addition, like many companies, we use “cookies” which are small text files a website can use to recognize repeat users, facilitate the user’s ongoing access to and use of the site and to track usage behavior of, for example, the webpages you visit.
- From social media websites, such as Facebook, Twitter, and LinkedIn.
- From credit reporting agencies.
- From other financial institutions. For example, through mergers and acquisitions.
- From third parties that assist us in providing certain transactions and services (e.g. payment processing, hosting).

How We Use Information We Collect

We use your personal data in ways that are compatible with the purposes for which it was collected or authorized by you, including for the following purposes:

Category	The Purpose for Collection
Identifiers	<ol style="list-style-type: none"> 1. To present, operate or improve the Site and Services, including analysis of Site activity; 2. To inform you about Services and products available from Georgia’s Own Credit Union; 3. To authorize access to our Sites and Services;

	<ol style="list-style-type: none">4. To provide, maintain, administer or expand the Services, performing business analyses, or for other internal purposes to support, improve or enhance our business, the Services, and other products and services we offer;5. To offer and administer programs;6. To customize or tailor your experience of the Services;7. To administer content, promotion, sweepstakes, surveys, voting polls or other Site features;8. To communicate about, and administer your participation in, special programs, surveys, contests, online campaigns, online programs, sweepstakes, and other offers or promotions, and to deliver pertinent emails;9. To send you marketing information and other non-transactional communications via email, telephone calls, SMS, or push notifications about us as necessary for our legitimate interest in conducting director marketing or to the extent that you have provided prior consent;10. With your consent as required by applicable law, we may send marketing and/or service-related text messages to your mobile device. You may opt out of receiving these messages by following the prompt in an individual message or updating your "Notifications" preferences under the website settings or the mobile application settings that control push notifications.11. To secure our Services, including to authenticate Users;12. To use statistical information that we collect in any way permitted by law, including from third parties in connection with their commercial and marketing efforts;
--	--

	<p>13. To respond to and support Users regarding their use of the Sites and Services;</p> <p>14. To comply with all applicable legal requirements;</p> <p>15. To enforce our Terms of Use and other agreements;</p> <p>16. To perform data analysis and testing;</p> <p>17. To investigate possible fraud or other violations of our Terms of Use or this Privacy Policy and/or attempts to harm our Users;</p> <p>18. To resolve disputes;</p> <p>19. To otherwise fulfill the purpose for which the information was provided.</p>
<p>Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))</p>	<p>20. To present, operate or improve the Site and Services, including analysis of Site activity;</p> <p>21. To inform you about Services and products available from Georgia’s Own Credit Union;</p> <p>22. To authorize access to our Sites and Services;</p> <p>23. To provide, maintain, administer or expand the Services, performing business analyses, or for other internal purposes to support, improve or enhance our business, the Services, and other products and services we offer;</p> <p>24. To offer and administer programs;</p> <p>25. To customize or tailor your experience of the Services;</p> <p>26. To administer content, promotion, sweepstakes, surveys, voting polls or other Site features;</p> <p>27. To communicate about, and administer your participation in, special programs, surveys, contests, online campaigns, online programs, sweepstakes, and other offers or promotions, and to deliver pertinent emails;</p> <p>28. To send you marketing information and other non-transactional communications via email, telephone</p>

	<p>calls, SMS, or push notifications about us as necessary for our legitimate interest in conducting director marketing or to the extent that you have provided prior consent;</p> <p>29. With your consent as required by applicable law, we may send marketing and/or service-related text messages to your mobile device. You may opt out of receiving these messages by following the prompt in an individual message or updating your "Notifications" preferences under the website settings or the mobile application settings that control push notifications.</p> <p>30. To improve our Site and Services;</p> <p>31. To secure our Services, including to authenticate Users;</p> <p>32. To use statistical information that we collect in any way permitted by law, including from third parties in connection with their commercial and marketing efforts;</p> <p>33. To respond to and support Users regarding their use of the Sites and Services;</p> <p>34. To comply with all applicable legal requirements;</p> <p>35. To enforce our Terms of Use and other agreements;</p> <p>36. To perform data analysis and testing;</p> <p>37. To investigate possible fraud or other violations of our Terms of Use or this Privacy Policy and/or attempts to harm our Users;</p> <p>38. To resolve disputes;</p> <p>39. To otherwise fulfill the purpose for which the information was provided.</p>
<p>Internet or other similar network activity</p>	<p>40. To authorize access to our Sites and Services.</p> <p>41. To provide you with Services.</p> <p>42. To offer and administer programs.</p>

	<p>43. To administer content, promotion, survey or other Site features.</p> <p>44. To improve our customer service.</p> <p>45. To respond to and support users regarding their use of the Sites and Services.</p>
<p>Commercial Information</p>	<p>46. To provide you with Services.</p> <p>47. To offer and administer programs.</p> <p>48. To comply with all applicable legal requirements.</p> <p>49. To facilitate registration or access or otherwise onboard a consumer as part of a new customer relationship.</p> <p>50. To respond to customer service inquiries initiated by the consumer.</p> <p>51. To improve products and services.</p>
<p>Professional or employment-related information</p>	<p>52. To comply with all applicable legal requirements</p>
<p>Inferences drawn from other personal information</p>	<p>53. To provide you with Services.</p> <p>54. To offer and administer programs.</p> <p>55. To administer content, promotion, survey or other Site features.</p> <p>56. To communicate about, and administer your participation in, special programs, online campaigns, online programs, and to deliver pertinent emails.</p> <p>57. To improve our customer service.</p> <p>58. To respond to and support users regarding their use of the Sites and Services.</p>

Disclosure of Personal Information

We may disclose your Personal Information for business purposes as allowed by law. Specifically, we share Personal Information with third-parties, such as, joint marketing partners, service providers, and other companies, organizations or individuals outside of Georgia's Own Credit Union if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- Fulfill any purpose for which you provide it;
- Meet or ensure compliance with any applicable law, regulation, legal process or enforceable governmental request;
- Enforce applicable Terms of Use, including investigation of potential violations;
- Detect, prevent, or otherwise address fraud, security or technical issues;
- Protect against harm to the rights, property, assets or safety of Georgia's Own Credit Union, our members or the public, content found on the Services, or to protect the Services from unauthorized use or misuse, as required or permitted by law;
- Facilitate a business transfer, such as to a buyer or other successor in the event of merger, acquisition, consolidation, divestiture, change in control, dissolution or other sale or transfer of some or all of Georgia's Own Credit Union's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which Personal Information held by Georgia's Own Credit Union about its members and users will be among the assets to be transferred, and any such successor may use your information for the same purposes set forth in the Privacy Policy.
- Process your transactions, maintain your account(s), and provide information to credit reporting agencies;
- Undertake research and development;
- Jointly market with other financial companies;
- Market our products and services to you;
- For any other purpose disclosed when you provide the information; and,
- When we obtain your consent to do so.

No Sale Policy

Georgia's Own does not sell member or consumer data. Because we do not sell member or consumer data, there is no opt-out for the selling of data provided on our website.

Privacy Rights Specific to Californians

Under the California Consumer Privacy Act, California residents have specific rights regarding their personal information. This section describes Californians' rights and explains how California residents can exercise those rights.

Right to Access Your Data. You have the right to request that we disclose certain information to you about our collection, use and disclosure of your Personal Information over the past twelve (12) months. Any disclosures we provide will only cover the 12-month period preceding the receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

Right to Data Portability. You have the right to a “portable” copy of your Personal Information that you have submitted to us. Generally, this means that the information provided shall be in a portable and, to the extent technically feasible, readily useable format that allows you to transmit this information to another entity without hindrance.

Right to Delete Your Data. You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.

Right to Non-Discrimination for the Exercise of Your Privacy Rights. You have the right not to receive discriminatory treatment by us for exercising your privacy rights conferred by the California Consumer Privacy Act.

Exercising Request to Access, Data Portability, and Deletion Rights

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

- Calling us at 800.533.2062 ext. 6098
- Emailing privacy@georgiasown.org
- Visiting georgiasown.org/ccpa-policy/ccpa-request/
- Visiting one of our branch locations.

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. We will only use personal information provided in a verifiable consumer request to verify the requestor’s identity or authority to make the request.

You may also designate an “authorized agent” to exercise your privacy rights on your behalf. In order to designate an authorized agent to make a request on your behalf, you must provide a valid power of attorney, the requester’s valid government-issued identification, and the authorized agent’s valid government issued identification.

Upon receiving your request, we will confirm receipt of your request by email, telephone or written correspondence. To help protect your privacy and maintain

security, we may take steps to verify your identity before granting you access to the information. In some instances, such as a request to delete personal information, we may first separately confirm that you would like for us to in fact delete your personal information before acting on your request.

It is our goal to respond to a verifiable 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. The Credit Union will provide notice by mail or electronically to account holders as allowed by law; and by mail or electronically to non-account holders, at your option, and as allowed by law. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt.

In some cases, our ability to uphold these rights for you may depend upon our obligations to process Personal Information for security, safety, fraud prevention reasons, compliance with regulatory or legal requirements, listed below, or because processing is necessary to deliver the services you have requested. Where this is the case, we will inform you of specific details in response to your request.

We may deny your deletion request if we are unable to verify your request or retaining the information is necessary for us or our service providers to:

- 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;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products 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;
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.);
- 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 information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
- 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.

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

For more information on our privacy practices, please review Georgia's Own Privacy Notice at <https://www.georgiasown.org/pdf/PrivacyPolicy.pdf>. If you have any specific questions about this Privacy Notice, please contact the Credit Union:

Email:

privacy@georgiasown.org

Written correspondence:

Georgia's Own Credit Union
ATTN: Data Protection Officer
100 Peachtree Suite #2800,
Atlanta, Georgia, 30303

Telephone:

800.533.2062 ext. 6098