



First Technology Federal Credit Union Notice to Consumer of State Privacy Protections

Effective Date: January 1, 2020

Last Reviewed on: October 27, 2020

This Notice supplements the information contained in First Technology Federal Credit Union's ("First Tech" or "we") [Privacy Policy](#) and [Online Privacy Policy Statement](#). For additional information please see our [Privacy Page](#) at firsttechfed.com.

First Tech collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("**personal information**").

Most of the information that First Tech collects is subject to the Gramm-Leach-Bliley Act ("GLBA"), the Fair Credit Reporting Act ("FCRA"), and regulations promulgated by the National Credit Union Administration ("NCUA") and the Consumer Financial Protection Bureau ("CFPB"). Thus, a vast majority of the information we collect may not be subject to the protections provided under state law.

If your state does not have specific laws, you may request details about the information we have collected specific to you through any of the methods listed in the Contact Information section below. In most cases, if we can verify who you are, we will provide you with a copy of your information upon request.

First Tech may disclose your personal information to a third party for a business purpose to perform services for us or to function on our behalf. Please see below for any state specific notices of privacy protections and our Privacy Policy for additional details.

First Tech does not sell personal information.

Contact Information

If you have any questions or comments about this notice or the ways in which First Tech collects and uses your information, please do not hesitate to contact us at:

Phone: 855.855.8805

Website: <https://www.firsttechfed.com/privacy-page>

Postal Address:

First Technology Federal Credit Union
Attn: Member Experience
PO BOX 2100
Beaverton, OR 97075



Changes to Our Privacy Notice

First Tech reserves the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on our website and update the notice's effective date. Your continued use of our products, services, and website following the posting of changes constitutes your acceptance of such changes.

FOR CALIFORNIA RESIDENTS:

This Notice applies to any consumer, member, visitor, user, and any others who are a "resident" of the State of California ("consumer" or "you") as defined under Title 18 of the California Code of Regulations Section 17014. We adopt this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA") and any terms defined in the CCPA have the same meaning when used in this notice.

Most of the information that First Tech collects is subject to the Gramm-Leach-Bliley Act ("GLBA"), the Fair Credit Reporting Act ("FCRA"), and regulations promulgated by the National Credit Union Administration ("NCUA") and the Consumer Financial Protection Bureau ("CFPB"). Thus, a vast majority of the information we collect is not subject to CCPA. First Tech is providing disclosure of the categories of information above in an effort to provide transparency.

Use of Personal Information

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

- To fulfill or meet the reason for which you provided the information. For example, if you share your name and contact information to request a price quote, apply for membership or a product, or ask a question about our products or services, we will use that personal information to respond to your inquiry. We may also save your information to facilitate new/future applications or process transactions.
- To provide, support, personalize, and develop our Website, products, and services.
- To create, maintain, customize, and secure your relationship with us.
- To process your requests, applications, transactions, payments, and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including investigating and addressing your concerns and monitoring and improving our responses.
- To personalize your online experience and to deliver content, product and service offerings relevant to your interests, including targeted offers and ads through our website, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our website, products and services, databases, other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our website, products, and services.
- To respond to law enforcement requests as required by applicable law, court order, or governmental regulations.
- To meet regulatory requirements, such as the Home Mortgage Disclosure Act (HMDA).
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.



- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of First Tech’s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by First Tech about consumers and our members are among the assets transferred.

First Tech will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Information We Collect

In particular, First Tech may collect, or has collected, the following categories of personal information from its consumers:

Category	Examples
A. Identifiers.	Names, addresses, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. <i>Some personal information included in this category may overlap with other categories.</i>
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status.
D. Commercial information.	Records of personal property; products or services purchased, obtained, or considered; or other purchasing or consuming histories or tendencies.
E. Biometric information.	Physiological, behavioral, and biological characteristics or activity patterns used to extract a template or other identifier or identifying information; such as, voiceprints, or other physical patterns.
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.
G. Geolocation data.	Physical location or movements.
H. Sensory data.	Audio, electronic, visual, or similar information.
I. Professional or employment-related information.	Current or past job history or performance evaluations.



Category	Examples
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as, grades, and transcripts.
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Personal information **does not** include:

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

First Tech obtains the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you purchase.
- Indirectly from you. For example, from observing your actions on our website and mobile apps.
- Credit reporting agencies.
- Other third parties you may consent to during a loan application such as employer, landlords, and schools.

Sharing Personal Information

First Tech may disclose your personal information to a third party for business purposes, to perform services for us, or to function on our behalf. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We share your personal information with the following categories of third parties:

- Service providers.



Sales of Personal Information

First Tech does not sell personal information.

Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, First Tech has disclosed the following categories of personal information for a business purpose:

Category A: Identifiers.

Category B: California Customer Records personal information categories.

Category C: Protected classification characteristics under California or federal law.

Category D: Commercial information.

Category E: Biometric information.

Category F: Internet or other similar network activity.

Category G: Geolocation data.

Category H: Sensory data.

Category I: Professional or employment-related information.

Category K: Inferences drawn from other personal information.

Your Rights and Choices

The CCPA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that First Tech disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.



Deletion Request Rights

Subject to certain exceptions, you have the right to request that First Tech delete any of your personal information that we collected from you and retained. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will delete (and direct our service providers to delete) your personal information from our records unless an exception applies.

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

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 on our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
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 information's deletion may likely render impossible or seriously impair the research's achievement, 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, such as contracts and regulatory requirements.
8. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

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

- Calling us at **855.855.8805**
- Visiting <https://www.firsttechfed.com/privacy-page>
- Send us a message through your online banking profile using secure messaging.

Only you or someone legally authorized to act on your behalf may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

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.

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

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



Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.

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

Appointing an Authorized Agent

Because First Tech collects information and provides services in its ordinary course of business as a financial institution you may only appoint an agent to act on your behalf using a power of attorney or limited power of attorney that meets the requirements of California State Law or the state the power of attorney was signed in.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (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.

If you have an account with us, we will deliver our written response to the email or physical address associated with that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

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 unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, 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 a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Questions or for More Information

If you have any questions or comments about this notice, the ways in which First Tech collects and uses your information described in this notice and in the Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us through any of the methods listed in Contact Information above.