

Hudson Valley Credit Union’s California Consumer Privacy Notice

This Notice is for California residents only and supplements the information contained in HVCU’s [Privacy Policy](#).

Hudson Valley Credit Union (“HVCU, “we,” or “us”) takes your privacy very seriously. This California Consumer Privacy Notice (“Notice”) explains how we collect, use, and disclose personal information about California residents (“consumer” or “you”) and certain rights that California residents have under the California Consumer Privacy Act of 2018 (“CCPA”). This Notice is provided pursuant to the CCPA and applies only to information about California residents. Any terms defined in the CCPA have the same meaning when used in this Notice.

Under the CCPA, “Personal Information” is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. The CCPA does not apply to, and the term “Personal Information” does not include certain information that is excluded from the scope of CCPA, such as the Gramm-Leach-Bliley Act (“GLBA”), the Fair Credit Reporting Act (“FCRA”), and regulations promulgated by the New York State Department of Financial Services (“DFS”), the National Credit Union Administration (“NCUA”), and the Consumer Financial Protection Bureau (“CFPB”). Most of the personal information HVCU collects is not subject to CCPA.

Keeping Personal Information secure is one of our most important priorities. Consistent with our obligations under applicable laws and regulations, we maintain physical, technical, electronic, procedural, and organizational safeguards and security measures that are designed to protect personal data against accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, or access, whether it is processed by us or our service providers.

Information We Collect

We collect and disclose Personal Information in a variety of contexts. For example, we collect and disclose Personal Information to provide individual financial products and services. The specific Personal Information that we collect, use, and disclose about California residents varies based on our relationship or interaction with that individual. During the past 12 months, we have collected the following categories of Personal Information:

Category	Examples
A. Identifiers.	Name, government-issued identifier such as Social Security number and driver’s license number.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	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. Some personal information included in this category may overlap with other categories.
C. Protected classification characteristics under California or federal law.	Age, marital status, gender, sex or veteran or military status.
D. Commercial information.	Products and services obtained, transaction history and purchase history.
E. Biometric information.	Physical characteristics, such as fingerprints and voiceprints.
F. Internet or other network activity.	Browsing history and information regarding interactions with our website, applications or advertisements.
G. Geolocation data.	Device location and Internet Protocol (IP) location.
H. Sensory data.	Audio, electronic, visual or similar information.

I. Professional or employment-related information.	Current or past job history.
J. Education Information.	Education records and information.
K. Inferences drawn from other personal information.	Profile or summary reflecting a person's preferences and characteristics.

Sources of Personal Information

HVCU obtains the categories of Personal Information listed above from the following categories of sources:

- Directly from you. For example, by telephone, email, or text, or from forms completed or products and services you requested.
- Indirectly from you. For example, by observing your actions on our website and mobile apps.
- From our service providers. For example, companies that provide data to support our operations and activities, such as fraud prevention and underwriting or verification of your identity when you contact us.
- Credit reporting agencies and public records, including records and information made available by federal, state, or local government entities.
- Other third parties from whom we collect Personal Information as part of providing products and services. For example, from your employer, landlord, and school as part of a loan application.

Use of Personal Information

We may use or disclose the Personal Information we collect for one or more of the following business purposes:

- To fulfill a request for which the information was provided. 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 the inquiry. We may also save the Personal Information to facilitate new/future applications or process transactions.
- To provide, support, develop, and personalize your experience on 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 or guidance.
- To meet regulatory requirements, such as the Home Mortgage Disclosure Act.
- As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.

HVCU will not collect additional categories of Personal Information or use the Personal Information we have collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

HVCU 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 routinely share Personal Information with:

- Service Providers we use to help deliver our products and services to you, such as loan and payment processors.
- Other third parties we use to support our operations, business development and management, such as website hosts.
- Third parties approved by you, including sites you choose to link your account to or third-party payment providers.
- Credit reporting agencies and sanctions screening providers;
- External auditors.
- Law enforcement and regulatory agencies to comply with our legal and regulatory obligations.

Sale of Personal Information

In the past 12 months, **HVCU has not sold Personal Information that is subject to the CCPA.** The CCPA defines “sale” as the disclosure of Personal Information to a third-party for monetary or other valuable consideration.

Your Rights under CCPA

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

- Request that HVCU disclose to you free of charge the following information covering the 12 months preceding your request:
 - The categories of Personal Information we collected about you.
 - The categories of sources from which we collected the Personal Information.
 - Our business purpose for collecting Personal Information about you.
 - The categories of third parties with whom we disclosed Personal Information about you and the categories of Personal Information disclosed.
 - The specific pieces of Personal Information we collected about you.
- Request we delete Personal Information we collected from you, unless the CCPA recognizes an exception.

If you are a California resident, a business may not discriminate against you for exercising your rights under the CCPA.

Responding to Requests

Only you, or someone legally authorized to act on your behalf, may make a verifiable request related to your Personal Information. Your verifiable request must provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative, and describe your request with sufficient detail to allow us to understand, evaluate and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. In addition, we will not honor your request where an exception applies, such as where the disclosure of Personal Information would adversely affect the rights of another consumer or where the Personal Information that we maintain about you is not subject to the CCPA’s access or deletion rights. We will advise you in our response if we are not able to honor your request.

We endeavor to respond to all verified requests within 45 days of receipt. If we need an extension of time, up to an additional 45 days, in order to process your request, we will provide you with an explanation and the extension period.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your verifiable request. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

How to Make Requests

If you are a California resident, you can make access requests or deletion requests by calling us at 800.328.8797 or by sending a secure email through your online banking account. You must include "CCPA Inquiry" in the subject line of your email.

Questions or Concerns

If you have any questions or comments about this Notice or the ways in which HVCU collects and uses your Personal Information, please contact us at:

1. Postal address:
Hudson Valley Credit Union Attn: CCPA Inquiry
P.O. Box 1071
Poughkeepsie, NY 12602-1071
2. Phone: 800.468.7886

Changes to This Notice

We may change or update this Notice from time to time. When we do, we will post the revised Notice on this webpage.