



California Consumer Privacy Act

On January 1, 2020, the California Consumer Privacy Act of 2018 (CCPA) became effective. (see California Civil Code Section 1798.100 et seq.). Under the CCPA, covered businesses that collect the personal information of California residents must provide notice regarding their data collection and sharing practices.

The specific Personal Information that we collect, use, and disclose relating to a California resident covered by the CCPA will vary based on our relationship or interaction with that individual. For example, this Disclosure does not apply with respect to information that we collect about California residents who apply for or obtain our financial products and services for personal, family, or household purposes (i.e., information subject to the Gramm-Leach-Bliley Act (“GLBA”)). For more information about how we collect, disclose, and secure information relating to these customers, please refer to our [Privacy Disclosure](#).

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 elsewhere.

Personal Information

INOVA Federal Credit Union does not sell Personal Information, and we have not done so in the past 12 months.

Right of Access

1. Request that we disclose to you the following information covering the 12 months preceding your request (“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 Personal Information about you;
 - the categories of Personal Information about you that we disclosed to third parties for a business purpose and the categories of third parties to whom we disclosed such Personal Information; and

- the specific pieces of Personal Information we collected about you
- 2. Request that we delete Personal Information that we collected from you, subject to applicable exceptions (“request to delete”)
- 3. Request that we delete Personal Information that we collected from you, subject to applicable exceptions (“request to delete”)
- 4. Be free from unlawful discrimination for exercising your rights under the CCPA.

You also have the right to designate an authorized agent to make a request under the CCPA on your behalf. If you wish to designate an authorized agent, INOVA Federal Credit Union requires a valid power of attorney with express powers under the CCPA.

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 you have 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’s rights.

We will advise you in our response if we are not able to honor your request. We will not provide nonpublic personal information such as social security numbers, driver’s license numbers or government-issued identification numbers, financial account numbers, healthcare or medical identification numbers, account passwords or security questions and answers, or 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.

Right to Deletion

If you are a California resident, you have the right to request the deletion of personal information that INOVA Federal Credit Union holds.

However, this right does not apply where the INOVA Federal Credit Union needs to retain the personal information in order to do any of the following:

- Provide goods or services to the you
- Detect or resolve issues security or functionality-related issues
- Comply with the law
- Conduct research in the public interest
- Safeguard the right to free speech
- Carry out any actions for internal purposes that the consumer might reasonably expect

Right to Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny the you goods or services
- Charge you different prices for goods or services, whether through denying benefits or imposing penalties
- Provide you with a different level or quality of goods or services

Requesting Access and Deletion

If you are a California resident (or an authorized agent thereof), you may make a request for the disclosures described above or request to delete Personal Information we collected from you using one of the following methods:

- Mail a notarized request to INOVA Federal Credit Union, PO Box 1148, Elkhart, IN 46515-1148
- Call us at (800) 826-5465

Upon receipt of your request, we will take steps to verify your identity. We will work to process all verified requests within 45 days pursuant to the CCPA. If we need additional time to process your request, we will reach out to you.