



September 19, 2023

## Privacy Notice

### FACTS

#### WHAT DOES CENTURY HERITAGE FCU DO WITH YOUR PERSONAL INFORMATION?

##### Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

##### What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- Account balances and payment history
- Transaction history and credit card or other debt

When you are *no longer* our member, we continue to share your information as described in this notice.

##### How?

All financial companies need to share members' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their members' personal information; the reasons Century Heritage chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Century Heritage share?	Can you limit this sharing?
<b>For our everyday business purposes</b> —such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	YES	NO
<b>For our marketing purposes</b> —to offer our products and services to you	YES	NO
<b>For joint marketing with other financial companies</b>	YES	NO
<b>For our affiliates' everyday business purposes</b> —information about your transactions and experiences	YES	NO
<b>For our affiliates' everyday business purposes</b> —information about your creditworthiness	NO	WE DO NOT SHARE
<b>For nonaffiliates to market to you</b>	NO	WE DO NOT SHARE

##### Questions?

Call 412-650-2600 or go to [chfcu.org](http://chfcu.org)

Who we are	
<b>Who is providing this notice?</b>	Century Heritage Federal Credit Union
What we do	
<b>How does Century Heritage protect my personal information?</b>	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.</p> <p>Century Heritage regularly conducts training of its employees as well as employs system upgrades and enhancements deemed necessary to protect your information.</p>
<b>How does Century Heritage collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>■ open an account or deposit money</li> <li>■ pay your bills or apply for a loan</li> <li>■ use your credit or debit card</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>■ sharing for affiliates' everyday business purposes— information about your creditworthiness</li> <li>■ affiliates from using your information to market to you</li> <li>■ sharing for nonaffiliates to market to you</li> </ul>

Definitions	
<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <b><i>rkGoBig, LLC</i></b></li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <b><i>Century Heritage does not share with nonaffiliates so they can market to you.</i></b></li> </ul>
<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>■ <b><i>Our joint marketing partners include investment, insurance and other financial service providers.</i></b></li> </ul>

**Effective Date September 19, 2023**

## **BIOMETRIC INFORMATION PRIVACY POLICY AND CONSENT**

### **Scope and Overview**

This policy outlines how Century Heritage Federal Credit Union, its vendors, and/or the licensor of the Century Heritage Federal Credit Union's consumer verification software processes biometric data collected from you for identity verification and fraud prevention purposes.

### **Biometric Data Defined**

As used in this policy, biometric data includes biometric identifiers and biometric information. "Biometric identifier" means a retina or iris scan, fingerprint, voiceprint, or scan of hand or face geometry. As the term is used in this policy, the selfie photograph you upload to the software for use in the biometric algorithm is considered a "biometric identifier." "Biometric information" means any information, regardless of how it is captured, converted, stored, or shared, based on an individual's biometric identifier used to identify an individual.

### **Disclosure and Authorization Policy**

To the extent that Century Heritage Federal Credit Union, its vendors, and/or the licensor of the Century Heritage Federal Credit Union's consumer verification software collect, capture, or otherwise obtain biometric data relating to a consumer, Century Heritage Federal Credit Union must first:

Inform each consumer that Century Heritage Federal Credit Union, its vendors, and/or the licensor of the Century Heritage Federal Credit Union's consumer verification software are collecting, capturing, or otherwise obtaining the consumers' biometric data, and that the Century Heritage Federal Credit Union is providing such biometric data to its vendors and the licensor of the Century Heritage Federal Credit Union's consumer verification software;

Inform the consumer of the specific purpose and length of time for which the consumer's biometric data is being collected, stored, and used; and

Receive consent by the consumer authorizing Century Heritage Federal Credit Union, its vendors, and/or Century Heritage Federal Credit Union's consumer verification software to collect, store, and use the consumer's biometric data for the specific purposes disclosed by the Century Heritage Federal Credit Union, and for Century Heritage Federal Credit Union to provide such biometric data to its vendors and the licensor of the Century Heritage Federal Credit Union's consumer verification software.

Century Heritage Federal Credit Union, its vendors, and/or the licensor of the Century Heritage Federal Credit Union's consumer verification software will not sell, lease, trade, or otherwise profit from consumers' biometric data; provided, however, that the Century Heritage Federal Credit Union's vendors and the licensor of the Century Heritage Federal Credit Union's consumer verification software may be paid for products or services used by Century Heritage Federal Credit Union that utilize such biometric data.

This policy is intended to comply with all federal, state, and local laws.

### **Purpose for the Collection of Biometric Data**

Century Heritage Federal Credit Union, its vendors, and/or the licensor of Century Heritage Federal Credit Union's consumer verification software collect, store, and use biometric data solely for identity verification and fraud prevention purposes.

**Disclosure**

Century Heritage Federal Credit Union will not disclose or disseminate any biometric data to anyone other than its vendors and the licensor of the Century Heritage Federal Credit Union's consumer verification software providing products and services using biometric data without/unless:

First obtaining consumer consent to such disclosure or dissemination;

The disclosed data completes a financial transaction requested or authorized by the consumer;

Disclosure is required by law or ordinance; or

Disclosure is required pursuant to a valid warrant or subpoena issued by a court of competent jurisdiction.

**Security**

Century Heritage Federal Credit Union shall use a commercially reasonable standard of care to store, transmit and protect from disclosure any biometric data collected. Such storage, transmission, and protection from disclosure shall be performed in a manner that is the same as or more protective than the manner in which Century Heritage Federal Credit Union stores, transmits and protects from disclosure other confidential and sensitive information, including personal information that can be used to uniquely identify an individual or an individual's account or property, such as genetic markers, genetic testing information, account numbers, PINs, driver's license numbers and social security numbers.

**Retention**

Century Heritage Federal Credit Union shall retain consumer biometric data only until, and shall request that its vendors and the licensor of Century Heritage Federal Credit Union's consumer verification software permanently destroy such data when, the first of the following occurs:

The initial purpose for collecting or obtaining such biometric data has been satisfied, such as verification of consumer identity;

Request of consumer to destroy the biometric data; or

Within 30 days of consumer's provisioning of biometric data.

**Contact Information**

If you have any questions about our use, storage, or security of your biometric data you can contact us at: [Mail@chfcu.org](mailto:Mail@chfcu.org).

**BIOMETRIC INFORMATION CONSUMER CONSENT**

As outlined in the "Biometric Information Privacy Policy", I understand and consent to the collection, use, retention, storage, and/or disclosure or re-disclosure of data or images from biometric verification technology by Century Heritage Federal Credit Union, its vendors, and/or the licensor of the Century Heritage Federal Credit Union's consumer verification software. I acknowledge that I have been given a copy of the Policy, or that the Policy has been made accessible to me, and I have had an opportunity to review it and request any additional information concerning the Century Heritage Federal Credit Union's procedures and safeguards for collecting, maintaining, using, disclosing, sharing, storing, and/or destroying this data.