



FACTS

WHAT DOES Frontwave Credit Union 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?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ■ Social Security number and information on membership and loan applications from you. ■ Account balances and transaction information related to your loan and deposit accounts. ■ Credit bureau reports and information from you or others. ■ Payment history ■ Transaction history ■ Mortgage rates and payments <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p>
How?	All financial companies need to share member's personal information to run their everyday business. In the section below, we list the reasons financial companies can share their member's personal information; the reasons Frontwave Credit Union chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Frontwave Credit Union share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes - to offer our products and services to you	Yes	Yes
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes – information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes – information about your creditworthiness	No	We don't share
For non-affiliates to market to you	Yes	Yes

Questions?	If you have any questions regarding the collection and sharing of your personal information by Frontwave Credit Union, please call us at 800.736.4500 or visit our web site at frontwavecu.com
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Who we are

Who is providing this notice?

Frontwave Credit Union

What we do

How does Frontwave Credit Union protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards, secured files and buildings.

Frontwave Credit Union regularly tests and assesses its information security measures, systematically trains employees and adopts upgrades.

How does Frontwave Credit Union collect my personal information?

We collect your personal information, for example, when you

- open an account or give us your contact information
- deposit money or apply for a loan
- use your credit or debit card

We collect your personal information from others, such as credit bureaus, affiliates or other companies.

Why can't I limit all sharing?

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes – information about your creditworthiness
- affiliates from using your information to market to you
- sharing for non-affiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- Our affiliates include Frontwave Investment Services, Frontwave Insurance Services, LLC- a solely owned credit union service organization of Frontwave Credit Union.

Non-affiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- Frontwave Credit Union will share on a limited basis, personal information with non-affiliates so they can market select services and products to you, on our behalf and at our discretion..

Joint marketing

A formal agreement between non-affiliated financial companies that together market financial products or services to you.

- Frontwave Credit Union does not jointly market.

Other important information

Frontwave Credit Union does not collect personally identifiable information via our website, therefore we are not subject to the disclosure requirements of California AB370.

California Consumer Privacy Act (CCPA)

Consumers' Rights

Under the California Consumer Privacy Act (CCPA), Consumers have a number of rights to their Personal Information. Below is a general description of these rights. Please note that each right is subject to exceptions and limitations, and any Consumer inquiry related to these rights should be communicated to Frontwave Credit Union to be handled in accordance with Frontwave Credit Union policy. As a general rule, Frontwave Credit Union DOES NOT SELL Consumer Personal Information. However, Frontwave Credit Union may share Personal information with affiliates or non-affiliates for business related purposes applicable to the management of your account, or to market select products and services. All affiliates and non-affiliates with whom we share Consumer Personal Information, are properly vetted and held to contract terms that insure Consumer Personal Information is properly managed and protected.

§ **Right to know:** Consumers may submit a request that we disclose:

- (1) The categories of Personal Information we have Collected about that Consumer in the preceding 12 months.
- (2) The specific pieces of Personal Information we have Collected about that Consumer in the preceding 12 months.
- (3) The categories of sources from which we Collected the Consumer's Personal Information in the preceding 12 months.
- (4) Our Business Purpose or Commercial Purpose for Collecting, Disclosing, or Sharing the Consumer's Personal Information in the preceding 12 months.
- (5) The categories of Third Parties to which we disclosed or shared the Consumer's Personal Information in the preceding 12 months.
- (6) The categories of Personal Information that we disclosed about that Consumer for a Business Purpose in the preceding 12 months, or the fact that we have not disclosed the Consumer's Personal Information.
- (7) The categories of Personal Information that we shared about that Consumer, by category or categories of Personal Information for each Third Party to whom the information was Shared in the preceding 12 months, or the fact that we have not shared the Consumer's Personal Information.

A consumer should not be required to create an account with us to make this request.

§ **Right to access:** Consumers may submit a request to access their Personal Information that we retain and have Collected in the preceding 12 months about them. To the extent that any such information is provided as a result of such a request, we should normally provide a copy of the Personal Information requested by the Consumer, free of charge, and sent in a structured, commonly used, electronic, and machine-readable format. We may delay our response to certain requests, charge a reasonable fee, or refuse to respond to certain requests in some circumstances. Consumers are restricted to submitting not more than two (2) requests per calendar year.

§ **Right to deletion:** Consumers may ask us to delete the Personal Information we hold about them. There are some circumstances when we are not required to delete the Personal Information, such as when we are required to keep the Personal Information by law, to fulfill the terms of a written warranty or for product recall purposes, or are engaged in an ongoing transaction. We also should direct any Service Providers to delete the Consumer's Personal Information from their records.

§ **Right to opt-out of the Sale of Personal Information:** Consumers may direct us to refrain from Sharing their Personal Information, unless and until the Consumer provides express authorization for the Sharing of the Consumer's Personal Information. Consumer may authorize another individual to exercise the Consumer's right to opt-out. We will comply with the request to refrain from Sharing the Consumer's Personal Information going forward and this will not affect the legality of any Sharing of the Consumer's Personal Information before the Consumer exercised their right to opt-out. **NOTE: Frontwave Credit Union DOES NOT sell Consumer Personal Information.**

§ **Right to not be discriminated against:** Consumers may exercise the above rights, without facing discrimination for exercising their rights, except where directly related to the difference in value recognized through an approved financial incentive program, including by:

- (1) Denying goods or services to the Consumer, although it is not necessarily discrimination if certain services require the Consumer's Personal Information in order to function properly.
- (2) Charging different prices or rates or levels of services for goods or services, unless that different level or quality of service is reasonably related to the value provided by the Consumer's Personal Information or the Consumer is involved in a financial incentive program.

Questions. For questions regarding your consumer rights in accordance with the California Consumer Privacy Act, please contact Frontwave Credit Union at 800-736-4500.

Disclosure as of: January 1, 2021