



## California Privacy Notice

Revised: March 2, 2026

This California Privacy Notice explains how we collect, share, use, and protect your personal information. This Privacy Notice applies to residents of California to the extent that the California Consumer Privacy Act (“CCPA”) is applicable. As used in this Privacy Notice, “personal Information” means any 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.

However, for purposes of the CCPA, personal Information does not include: (i) publicly available information; (ii) deidentified or aggregated consumer information; or (iii) personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (“FCRA”) and the Gramm-Leach-Bliley Act (“GLBA”). Accordingly, this Privacy Notice does not apply to such information.

The specific personal information that we collect, use, and disclose relating to a California resident in different contexts covered by the CCPA will vary based on our relationship or interaction with that individual. For example, this CCPA Disclosure does not apply with respect to information that we collect about California residents who apply for, obtain, or maintain our financial products and services, or whose personal information is otherwise collected, processed, or disclosed pursuant 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 U.S. Consumer Privacy Notice. We may use the information described below for any of the purposes described in this Privacy Notice or for our business, security, or operational purposes compatible with the context in which the personal information was collected, unless limitations are listed in this Privacy Notice or described elsewhere at the time of collection of the information.

### **I. CATEGORIES OF PERSONAL INFORMATION WE COLLECT**

In the preceding 12-months, we have collected the following categories of personal information (please note that some categories overlap):

<b>Category</b>	<b>Examples</b>
A. Identifiers	A real name or alias; postal address; signature; home phone number or mobile phone number; bank account number, credit card number, debit card number, or other financial information; physical characteristics or description; email address; account name; Social Security number; driver's license number or state identification card number; passport number; or other similar identifiers.
B. Personal information categories described in Cal. Civ. Code § 1798.80(e)	Signature; state identification card number; physical characteristics or description; insurance policy number; education; employment or employment history; bank account number, credit card number, debit card number, or any other financial information.

C. Protected classification characteristics under state or federal law	Age, race, national origin, citizenship, marital status, gender, 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. Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
F. Geolocation data	Physical location or movements. For example, city, state, country, and ZIP code associated with your IP address or derived through Wi-Fi triangulation; and, with your permission in accordance with your mobile device settings, and precise geolocation information from GPS-based functionality on your mobile devices.
G. Sensory data	Audio, electronic, visual, or similar information.
H. Sensitive Personal Information.	A consumer's social security, driver's license, state identification card, or passport number; A consumer's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.

**II. CATEGORIES OF SOURCES FROM WHICH PERSONAL INFORMATION IS COLLECTED**

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from consumers or their agents. For example, from forms you complete, when you perform transactions, and when you purchase products or services.
- Indirectly from consumers or their agents. For example, when you use your debit or credit cards, when you make deposits or withdrawals to/from your accounts, or when you pay your bills.
- Directly and indirectly from activity on our website or our mobile applications. For example, from submissions through our website, application portals, or website usage collected automatically.
- From third parties, such as credit reporting agencies, government agencies, law enforcement agencies, and service providers.

**III. BUSINESS OR COMMERCIAL PURPOSE FOR COLLECTING PERSONAL INFORMATION**

We may collect, use and disclose your personal information for one or more of the following business or commercial purposes:

- To fulfill or meet the reason for which the information is provided. For example, you apply for a loan, and we use the information in your loan application to give you the loan.

- To provide you with information, products or services that you request from us.
- To evaluate your candidacy for employment or for an independent contractor engagement, and to administer employment-related benefits for you, your spouse or domestic partner, and your dependents.
- To provide you with email alerts, event registrations or other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our website and present its contents to you.
- For testing, research, analysis to improve our products and services and for developing new ones.
- To protect the rights, property or safety of us, our employees, our members or others.
- To detect security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, in which personal information held by us is among the assets transferred.
- As otherwise permitted by law.

We do not use or disclose your sensitive personal information for any purpose other than, as reasonably necessary and proportionate, for the following purposes:

- To perform the services or provide the goods reasonably expected by an average consumer who requests those goods and services.
- To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted personal information.
- To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions.
- To ensure the physical safety of natural persons.
- For short-term, transient use, including, but not limited to, non-personalized advertising shown as part of your current interaction with the business, provided that the personal information is not disclosed to another third party and is not used to build a profile about you or otherwise alter your experience outside of your current interaction with us.
- For our service providers or contractors to perform services on our behalf, such as maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on our behalf; provided, however, that the use of your sensitive personal information is reasonably necessary and proportionate for this purpose.

- To verify or maintain the quality or safety of a service or device that is owned, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured for, or controlled by us; provided, however, that the use of your sensitive personal information is reasonably necessary and proportionate for this purpose.
- To collect or process sensitive personal information where such collection or processing is not for the purpose of inferring characteristics about you.

#### IV. HOW WE SHARE AND DISCLOSE PERSONAL INFORMATION

In addition to the specific situations discussed elsewhere in this Privacy Notice, we may disclose your personal information in the following situations:

- **Service Providers.** We may share your information with service providers. Among other things, service providers may help us to administer our website, conduct surveys, provide technical support, process payments, assist in the fulfillment of services, and help us market our own products and services.
- **Joint Marketing Partners.** We may share your information with other companies to offer you co-branded financial products and services.
- **Advertising Networks** We share limited personal information with advertising partners for cross-context behavioral advertising.
- **Compliance with Laws and Other Lawful Uses.** We may disclose information to law enforcement agencies and other government entities or private parties in litigation in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also share your information with these parties to establish or exercise our rights, to defend against a claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies. We may also disclose your personal information with our acquisition or merger partners in the event of an acquisition or merger. Furthermore, we may disclose your personal information as permitted by applicable law. All of the categories of personal information we collect from you may be disclosed for this purpose.
- **Your Consent.** All the categories of personal information we collect from you may be disclosed to third parties with your consent or direction.

In addition to the information above, California law requires that organizations disclose whether the specific categories of personal information defined in the CCPA have been disclosed to third parties for a “business purpose,” or “sold” or transferred for “valuable consideration, or “shared” for purposes of cross-context behavioral advertising. We do not have actual knowledge of selling or sharing personal information of minors under 16 years of age for cross-context behavioral advertising.

The table below indicates which of these specified categories we may collect and transfer in a variety of contexts.

<b>CATEGORY OF PERSONAL INFORMATION</b>	<b>CATEGORY OF RECIPIENTS (FOR BUSINESS PURPOSE)</b>	<b>CATEGORY OF RECIPIENTS (FOR “SALE” OR “VALUABLE CONSIDERATION”)</b>	<b>CATEGORY OF RECIPIENTS (CROSS-CONTEXT BEHAVIORAL ADVERTISING)</b>
Identifiers such as name, address, unique personal identifier, email address, or account name.	Service providers; Joint marketing partners; Advertising networks; Third parties for compliance with laws and other lawful purposes; and Third parties with your consent.	Not sold.	Advertising networks.
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Service providers; Joint marketing partners; Advertising networks; Third parties for compliance with laws and other lawful purposes; and Third parties with your consent.	Not sold.	Not shared.
Protected classification characteristics under state or federal law	Service providers; Joint marketing partners; Advertising networks; Third parties for compliance with laws and other lawful purposes; and Third parties with your consent.	Not sold.	Not shared.
Commercial information	Service providers; Joint marketing partners;	Not sold.	Not shared.

	Advertising networks; Third parties for compliance with laws and other lawful purposes; and Third parties with your consent.		
Biometric information	Service providers; Third parties for compliance with laws and other lawful purposes; and Third parties with your consent.	Not sold.	Not shared.
Internet or other similar network activity	Service providers; Advertising networks; Third parties for compliance with laws and other lawful purposes; and Third parties with your consent	Not sold.	Advertising networks.
Geolocation data	Service providers; Joint marketing partners; Advertising networks; Third parties for compliance with laws and other lawful purposes; and Third parties with your consent.	Not sold.	Not shared.
Sensory data	Service providers; Third parties for compliance with laws and other lawful purposes; and Third parties with your consent.	Not sold.	Not shared.
Professional or employment-related information	Service providers; Third parties for compliance with laws and other lawful purposes; and Third parties with your consent.	Not sold.	Not shared.

Non-public education information	Service providers; Third parties for compliance with laws and other lawful purposes; and Third parties with your consent.	Not sold.	Not shared.
Inferences drawn from other personal information	Service providers; Joint marketing partners; Advertising networks; Third parties for compliance with laws and other lawful purposes; and Third parties with your consent.	Not sold.	Not shared.
Sensitive personal information	Service providers; Third parties for compliance with laws and other lawful purposes; and Third parties with your consent.	Not sold.	Not shared

## V. YOUR RIGHTS AND CHOICES

This section describes your rights and choices regarding how we collect, share, use, and protect your personal information, how to exercise those rights, and limits and exceptions to your rights and choices.

### 1. Exceptions

The rights and choices in this section do not apply:

- If you are not a California resident.
- If we collected personal information covered by certain financial sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA). Such laws govern how we collect, share, use and protect your personal information instead of the CCPA.
- To aggregate consumer information.
- To deidentified personal information.
- To publicly available information.

## **2. Right to Know**

If the above exceptions do not apply, and you have not made this request more than twice in a 12-month period, you have the right to request that we disclose certain information to you about our collection and use of your personal information. Once we receive and confirm your request and verify that the request is coming from you or someone authorized to make the request on your behalf, we will disclose to you or your representative:

- 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, sharing or selling that personal information.
- The categories of third parties to whom we disclosed, shared or sold your personal information.
- The specific pieces of personal information we collected about you in a form that you can take with you (also called a “data portability request”).

To exercise the Right to Know, a consumer or a consumer’s authorized agent may submit a verifiable consumer request to us by either:

- Calling us at 301-497-7000 or 866-56-TOWER
- Email us at [memberservices3@towerfcu.org](mailto:memberservices3@towerfcu.org)

## **3. Right to Delete**

You have the right to request that we delete any of your personal information that we collect from you and retained, subject to certain exceptions. Once we receive and verify your request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

The right to delete does not apply to personal information that is collected, processed, sold, or disclosed pursuant to the Gramm-Leach-Bliley Act (GLBA), the Fair Credit Reporting Act (FCRA), or other applicable financial or regulatory record-retention requirements.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated by you within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Help to ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for those purposes.
3. Debug to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise that consumer’s right of free speech, or exercise another right provided for by law.

5. Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.
6. 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 businesses' deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you previously provided informed consent.
7. To enable solely internal uses that are reasonably aligned with your expectation based on your relationship with us and compatible with the context in which you provided the information.
8. Comply with a legal obligation.

To exercise the Right to Delete, a consumer or a consumer's authorized agent may submit a verifiable consumer request to us by either:

- Calling us at 301-497-7000 or 866-56-TOWER
- Email us at [memberservices3@towerfcu.org](mailto:memberservices3@towerfcu.org)

#### **4. Right to Correct**

You have the right to request that we correct inaccurate personal information that we maintain about you.

To exercise this Right to Correct, a consumer or a consumer's authorized agent may submit a verifiable consumer request to us by either:

- Calling us at 301-497-7000 or 866-56-TOWER
- Email us at [memberservices3@towerfcu.org](mailto:memberservices3@towerfcu.org)

#### **5. Right to Opt-Out of the Sale of Personal Information**

The CCPA defines a "sale" differently than what you might expect. Under the CCPA, a "sale" is defined the disclosure of personal information to a "third-party" for monetary or other valuable consideration, and the term "third-party" does not include our service providers or contractors when we have a written contract in place that meet certain requirements set forth in the CCPA. Thus, disclosure of your personal information to our service providers and contractors is not a "sale" under the CCPA.

With the above in mind, we have not sold your personal information in the previous 12-months.

## **6. Right to Opt-Out of the Sharing of Personal Information for Cross-Context Behavioral Advertising**

The CCPA defines “share” or “sharing” differently than what you might expect. The CCPA defines “share” or “sharing” to a third party for purposes of “cross-context behavioral advertising,” which in turn is defined as the targeting of advertising to a consumer based on the consumer’s personal information obtained from the consumer’s activity across businesses, distinctly branded internet websites, applications, or services, other than the business, distinctly branded internet website, application, or service with which the consumer intentionally interacts.

## **7. Right of Non-Discrimination**

We will not discriminate against you for exercising any of your rights in this Privacy Notice and under applicable laws. Unless permitted by law, 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 for goods or services or a different level or quality of goods or services.
- Retaliate against you as our employee, applicant for employment, or independent contractor.

## **8. General Description Regarding Identity Verification Requirements**

We cannot respond to a Request to Know, Delete, Correct or Access without first verifying the identity of the requestor. Making a verifiable consumer request does not require you to create an account with us. However, we may consider requests made through a password protected account with us sufficiently verified when the request relates to personal information associated with that specific account.

If we receive a request through an authorized agent of the consumer, we will require:

1. Submission of a written document signed by the consumer with the consumer’s permission for the authorized agent to submit a verifiable request on their behalf and require the authorized agent to verify their own identity to us; or
2. The consumer to directly verify with us that they have authorized the agent to submit the request.
3. We will not require either of the above if the authorized agent provides a copy of a power of attorney pursuant to California Probate Code sections 4121 to 4130 and we are able to verify authorized agent’s identity.

We will only use personal information provided in the request to verify the requestor’s identity or authority to make it. The verification process includes matching the information you provide us with the information we have in our records. The stringency of the verification process depends

on the sensitivity of the request, whether or not the consumer is a current customer with a password-protected account, the need to prevent unauthorized access and disclosure of personal information and other factors. Within 10-days of your submission of your CCPA request, we will notify you of any additional information we might need to verify your identity.

## **9. Response Timing and Format**

We endeavor to respond to a verifiable consumer request within 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. 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.

## **VI. CHANGES TO OUR PRIVACY NOTICE**

We reserve the right to amend this Privacy Notice at our discretion and at any time.

## **VII. CONTACT INFORMATION**

If you have any questions or comments about this Privacy Notice, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights, or to request changes to any of your personally identifiable information that we have collected, please do not hesitate to contact us at:

Phone: 301-497-7000 or 866-56-TOWER  
Website: [www.towerfcu.org](http://www.towerfcu.org)  
Email: [memberservices3@towerfcu.org](mailto:memberservices3@towerfcu.org)  
Mail: Attn: Compliance Department  
Mail Stop 255  
P.O. Box 123  
Annapolis Junction, MD 20701-0123