

# HONDA

## Federal Credit Union

### Honda Federal Credit Union Privacy Policy for California Residents

This **Privacy Policy for California Residents** supplements the information contained in Honda Federal Credit Union's [Online Privacy Policy](#) and applies solely to all visitors, users, and others, as well as owners, directors, officers and employees of companies that do business with the Credit Union, who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 as amended by the California Privacy rights Act of 2020 (CCPA), and its implementing regulations, and any terms defined in the CCPA have the same meaning when used in this Policy.

This Policy **does not apply** to workforce-related personal information collected from California-based employees, job applicants, contractors, or similar individuals. If you have any questions to workforce-related personal information, please reach out to America Honda Motor Co., Inc. by calling [844-214-6632](tel:844-214-6632).

Also, this Policy **does not apply** to information collected from California residents who apply for or obtain our financial products and services for personal, family, or household purposes as this information is subject to the Gramm-Leach-Bliley Act (GLBA), Fair Credit Reporting Act (FCRA), or California Financial Information Privacy Act (FIPA) and is excluded from the CCPA's scope. For more information on how we collect, disclose, and secure this information, please refer to our [Federal Privacy Notice](#).

#### Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("**personal information**"). Personal information does not include publicly available information from government records, or deidentified or aggregated consumer information.

The table below describes the categories of personal information and sensitive personal information we may have collected from consumers within the last twelve (12) months.

<b>Category of Personal Information</b>	<b>Examples of Personal Information</b>
<b>A – Identifiers</b>	(A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.)
<b>B – California customer records personal information</b>	(A 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.)
<b>C – Protected classification characteristics under California or federal law</b>	(Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
<b>D – Commercial information</b>	(Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.)
<b>E – Biometric information</b>	(Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.)
<b>F – Internet or other similar network activity</b>	(Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.)
<b>G – Geolocation data</b>	(Physical location or movements.)
<b>H – Sensory data</b>	(Audio, electronic, visual, thermal, olfactory, or similar information.)
<b>I – Professional or employment-related information</b>	(Current or past job history or performance evaluations.)
<b>J – Non-public education information</b>	(Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.)
<b>K – Inferences drawn from other personal information</b>	(Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.)

<b>L – Sensitive Personal Information</b>	Government identifiers such as social security, driver’s license, state identification card, or passport number; complete account access credentials such as user names, account numbers, or card numbers combined with required access/security code or password; precise geolocation; racial or ethnic origin; religious or philosophical beliefs; union membership; genetic data; mail, email, or text messages contents not directed to us; unique identifying biometric information; health information; sex life, or sexual orientation information
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**Sources of Personal Information**

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

- Directly from you or your representatives;
- Service Providers, Consumer Data Resellers, Credit Reporting Agencies and other similar persons or entities;
- Public Record Sources (Federal, State or Local Government Sources);
- Information from our Affiliates;
- Website/Mobile App Activity/Social Media;
- Information from member directed persons or entities or institutions representing a member/prospect; and
- Information from business members about individuals associated with the business member (e.g., an employee or board member).

**Retention Policy**

We retain personal information (including sensitive personal information) for as long as needed or permitted with respect to the purpose(s) for which it was obtained and consistent with applicable law. We will determine the specific retention period depending on applicable legal requirements and the sensitivity of the information.

**Use of Personal Information**

We may use or disclose the personal information we collect for one or more of the following purposes, but any sensitive personal information we collect about the consumers is used or disclosed only for the purposes set forth in Section 7027(m) of the California Code of Regulations and not for inferring characteristics about the consumer:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request or ask a question about our financial products or services, we will use that personal information to respond to your inquiry. If

you provide your personal information to apply for a financial product or enroll in a service, we will use that information to complete your request.

- To provide, support, personalize, and develop our Website, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your Website experience and to deliver content and financial 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, financial products and services, databases and 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 and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To protect the rights, property, or safety of us, our employees, our members, or others.
- To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity and prosecute those responsible for that activity.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

### **Sharing or Selling Personal Information**

As used in this policy, and as defined in the CCPA, “share” means communicating a consumer's personal information to a third party for cross-context behavioral advertising.

We do not share your personal information or your sensitive personal information.

We also do not sell your personal information or your sensitive personal information.

We do not offer an opt-out from the sale or sharing of personal information because we do not engage in the sale or sharing of your personal information for cross-context behavioral advertising.

### **Disclosing Personal Information to Third Parties for Business Purposes**

We may disclose your personal information to a third party for a business purpose. In the preceding twelve (12) months, Credit Union has disclosed personal information for a business purpose to the categories of third parties indicated below.

**We will only use or disclose your personal information for the purpose(s) it was collected and as otherwise identified in this policy.**

**Categories of Third Party Vendors**

- Our third party service providers subject to appropriate confidentiality and use restrictions.
- Other companies to bring you co-branded services, products, or programs.
- Government, legal and regulatory authorities.
- Other third party organizations in connection with routine or required reporting.
- Other third party organizations to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights or other applicable policies; to address fraud, protect our assets, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third-parties.

In the preceding twelve (12) months, Credit Union may have disclosed personal information for a business purpose to the categories of third parties indicated in the chart below.

Category of Personal Information	Third Party Category to Whom We Disclosed Personal Data For Business Purposes
<b>A – Identifiers</b>	<ul style="list-style-type: none"> <li>• Our third party service providers subject to appropriate confidentiality and use restrictions.</li> <li>• Other companies to bring you co-branded services, products, or programs.</li> <li>• Government, legal and regulatory authorities.</li> <li>• Other third party organizations in connection with routine or required reporting.</li> <li>• Other third party organizations to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights or other applicable policies; to address fraud, protect our assets, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third-parties.</li> </ul>
<b>B – California customer records personal information</b>	<ul style="list-style-type: none"> <li>• Our third party service providers subject to appropriate confidentiality and use restrictions.</li> <li>• Other companies to bring you co-branded services, products, or programs.</li> <li>• Government, legal and regulatory authorities.</li> <li>• Other third party organizations in connection with routine or required reporting.</li> </ul>

	<ul style="list-style-type: none"> <li>• Other third party organizations to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights or other applicable policies; to address fraud, protect our assets, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third-parties.</li> </ul>
<p><b>C – Protected classification characteristics under California or federal law</b></p>	<ul style="list-style-type: none"> <li>• Our third party service providers subject to appropriate confidentiality and use restrictions.</li> <li>• Other companies to bring you co-branded services, products, or programs.</li> <li>• Government, legal and regulatory authorities.</li> <li>• Other third party organizations in connection with routine or required reporting.</li> <li>• Other third party organizations to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights or other applicable policies; to address fraud, protect our assets, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third-parties.</li> </ul>
<p><b>D – Commercial information</b></p>	<ul style="list-style-type: none"> <li>• Our third party service providers subject to appropriate confidentiality and use restrictions.</li> <li>• Other companies to bring you co-branded services, products, or programs.</li> <li>• Government, legal and regulatory authorities.</li> <li>• Other third party organizations in connection with routine or required reporting.</li> <li>• Other third party organizations to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights or other applicable policies; to address fraud, protect our assets, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third-parties.</li> </ul>
<p><b>E – Biometric information</b></p>	<ul style="list-style-type: none"> <li>• Our third party service providers subject to appropriate confidentiality and use restrictions.</li> <li>• Government, legal and regulatory authorities.</li> <li>• Other third party organizations to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights or other applicable policies; to address fraud, protect our assets, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third-parties.</li> </ul>
<p><b>F – Internet or other similar network activity</b></p>	<ul style="list-style-type: none"> <li>• Our third party service providers subject to appropriate confidentiality and use restrictions.</li> </ul>

	<ul style="list-style-type: none"> <li>• Other companies to bring you co-branded services, products, or programs.</li> <li>• Other third party organizations to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights or other applicable policies; to address fraud, protect our assets, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third-parties.</li> </ul>
<b>G – Geolocation data</b>	<ul style="list-style-type: none"> <li>• Our third party service providers subject to appropriate confidentiality and use restrictions.</li> <li>• Other companies to bring you co-branded services, products, or programs.</li> <li>• Government, legal and regulatory authorities.</li> <li>• Other third party organizations in connection with routine or required reporting.</li> <li>• Other third party organizations to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights or other applicable policies; to address fraud, protect our assets, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third-parties.</li> </ul>
<b>H – Sensory data</b>	<ul style="list-style-type: none"> <li>• Our third party service providers subject to appropriate confidentiality and use restrictions.</li> <li>• Other companies to bring you co-branded services, products, or programs.</li> <li>• Other third party organizations to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights or other applicable policies; to address fraud, protect our assets, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third-parties.</li> </ul>
<b>I – Professional or employment-related information</b>	<ul style="list-style-type: none"> <li>• Our third party service providers subject to appropriate confidentiality and use restrictions.</li> <li>• Other companies to bring you co-branded services, products, or programs.</li> <li>• Government, legal and regulatory authorities.</li> <li>• Other third party organizations in connection with routine or required reporting.</li> <li>• Other third party organizations to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights or other applicable policies; to address fraud, protect our assets, security or technical issues; to respond to an emergency; or otherwise to</li> </ul>

	protect the rights, property or security of our customers or third-parties.
<b>J – Non-public education information</b>	<ul style="list-style-type: none"> <li>• Our third party service providers subject to appropriate confidentiality and use restrictions.</li> <li>• Other companies to bring you co-branded services, products, or programs.</li> <li>• Government, legal and regulatory authorities.</li> <li>• Other third party organizations in connection with routine or required reporting.</li> <li>• Other third party organizations to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights or other applicable policies; to address fraud, protect our assets, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third-parties.</li> </ul>
<b>K – Inferences drawn from other personal information</b>	<ul style="list-style-type: none"> <li>• Our third party service providers subject to appropriate confidentiality and use restrictions.</li> <li>• Other companies to bring you co-branded services, products, or programs.</li> <li>• Government, legal and regulatory authorities.</li> <li>• Other third party organizations in connection with routine or required reporting.</li> <li>• Other third party organizations to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights or other applicable policies; to address fraud, protect our assets, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third-parties.</li> </ul>
<b>L – Sensitive Personal Information</b>	<ul style="list-style-type: none"> <li>• Our third party service providers subject to appropriate confidentiality and use restrictions.</li> <li>• Other companies to bring you co-branded services, products, or programs.</li> <li>• Government, legal and regulatory authorities.</li> <li>• Other third party organizations in connection with routine or required reporting.</li> <li>• Other third party organizations to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights or other applicable policies; to address fraud, protect our assets, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third-parties.</li> </ul>

**Purpose of Disclosing to Third Party Vendors**

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request or ask a question about our financial



products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to apply for a financial product or enroll in a service, we will use that information to complete your request.

- To provide, support, personalize, and develop our Website, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your Website experience and to deliver content and financial 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, financial products and services, databases and 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 and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To protect the rights, property, or safety of us, our employees, our members, or others.
- To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity and prosecute those responsible for that activity.

### **Your Rights and Choices**

The CCPA provides consumers (California residents) with specific rights regarding their personal information. Please note, not all of the rights described above are absolute, and they do not apply in all circumstances. In some cases, we may limit or deny your request because the law permits or requires us to do so, or if we are unable to adequately verify your identity. This section describes your CCPA rights and explains how to exercise those rights.

#### ***Right to Know and Data Portability***

You have the right to request that we disclose certain information to you about our collection, use and disclosure of your personal information. You also have the right to request the specific pieces of information we have collected about you, subject to certain exceptions (the "right to know").

### ***Right to Delete***

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions (the "right to delete").

### ***Right to Correct***

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

### ***Right to Opt-out of Sale or Sharing***

Generally, the CCPA affords consumers with the right to opt-out of the sale or sharing of personal information. However, we do not sell or share your personal information. Therefore, we are not required to provide you with the right to opt-out of sale or sharing.

### ***Right to Limit***

We only use a consumer's sensitive personal information for the purposes identified in Section 7027(m) of the California Code of Regulations. Therefore, we are not required to give you notice of the right to limit the use of sensitive personal information or give you the opportunity to request that such information be limited.

### ***Right to be Free from Discrimination***

We will not discriminate against you for exercising any of your CCPA rights.

### ***Exercising Your CCPA Rights***

To exercise your rights to know, delete or correct described above, please submit a request by either:

- Visiting our [CCPA Request Form](#) and submitting a CCPA Request online.
- Calling us at [888-500-9927](tel:888-500-9927).

Only you, or someone legally authorized to act on your behalf, may make a request to know, delete or correct related to your personal information. To designate an authorized agent, please complete a [CCPA Authorized Agent Form](#).

You may also make a request to know, delete, or correct on behalf of your child by completing a [CCPA Minor Authorization Form](#).

If you are a California based employee, applicant, contractor, or similar individual, please submit any CCPA based request directly to American Honda Motor Co., Inc. by either:

- Submitting a request online by completing an [Employee CCPA Form Here](#).
- Submitting a request by phone by contacting [844-214-6632](tel:844-214-6632).

If you have any questions to workforce-related personal information, please reach out to America Honda Motor Co., Inc. by calling [844-214-6632](tel:844-214-6632).

You may only submit a request to know twice within a 12-month period.

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.

When making a Request under the CCPA, we will attempt to verify your identity to ensure the protection of your personal information. This verification process may include matching the information you provide in your request with the information maintained in our records.

You do not need to create an account with us to submit a request CPRA rights request.

We will only use personal information provided in the request to verify the requestor's identity or authority to make it.

### ***Response Timing and Format***

We may require additional verification before we are able to process your request. If required, we will contact you using the information provided in your CCPA request to obtain the necessary additional verification.

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please contact our Privacy Team at [888-500-9927](tel:888-500-9927).

We will respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

We do not charge a fee to process or respond to a verifiable consumer request.

### **Changes to Our Privacy Policy**

We reserve the right to amend this privacy policy at our discretion and at any time. When we make changes to this privacy policy, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

### **Contact Information**

If you have any questions or comments about this notice, the ways in which Honda Federal Credit Union collects and uses your information described here [and in the [Privacy Policy](#)], your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

**Phone:** [888-500-9927](tel:888-500-9927)

**Website:** [Contact Us Page](#)

**Postal Address:**

Honda Federal Credit Union  
Attn: Compliance Department/CCPA-CPRA  
19701 Hamilton Avenue, Suite 130  
P.O. Box 2290

Torrance, CA 90502

If you have any questions about this Notice or need to access it in an alternative format due to having a disability, please contact Honda Federal Credit Union's Privacy Department at [888-500-9927](tel:888-500-9927).

**Date Last Updated:** July 1, 2023