



Privacy Notice—California

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS (“Notice”) supplements the information contained in CU Student Choice Partners’ (“Student Choice”) Online Privacy Statement (“Statement”). This Notice applies only to visitors, users, and others who reside in the State of California (“consumers” or “you”). This Notice differs from the Privacy Policy provided to you by your credit union. Additionally, because this website is hosted separately from your credit union’s website, the online practices described in this Statement may differ from the privacy statement provided to you by your credit union found on the credit union’s website.

Information We Collect

When you visit our website, or use our online services, Student Choice may collect information about you that is classified as personal information under the California Consumer Privacy Act of 2018 (“CCPA”). We have collected the following information from consumers in the last twelve months:

Category	Description/Examples	Is Data Collected?
A. Identifiers.	First and last name, postal address, unique personal identifiers, internet protocol address, email address, account name, social security number, driver’s license number, date of birth, or other similar identifiers.	Yes
B. Personal Information described in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e)).	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.	Yes
C. Demographic information protected under California law.	Age, race, national origin, citizenship, religion, marital status, sex, and veteran status.	Yes
D. Commercial Information.	Records of personal property, products or services purchased, obtained, or considered.	Yes
E. Biometric Information.	Physiological, biological, genetic, or behavioral characteristics, that can be used, singly or in combination, to establish individual identity. Including Biometric imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template can be extracted.	No
F. Internet Activity.	Browsing history, search history, information on a consumer’s interaction with website, application, or advertisement.	Yes
G. Geolocation Data.	Physical location or movements.	No

H. Sensory Data.	Audio, electronic, visual, thermal, olfactory, or similar information.	No
I. Employment Information.	Current or past job history and income.	Yes
J. Non-Public Education Information.	Education records maintained by an educational institution including grades, transcripts, student identification codes, financial information, and disciplinary records.	Yes
K. Inferential Information.	Inferences that can be drawn from any information collected to create a profile about a consumer reflecting the consumer’s preferences, characteristics, physiological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No

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

- Directly from our clients or their agents. For example, information from our clients concerning your credit union membership.
- Directly from you. For example, information you provide us on our websites.
- Directly and indirectly from you when using our Services or visiting our website. For example, usage details collected automatically in the course of your interaction with our platforms or websites.

Use of Personal Information

We may use or disclose the personal information we collect for the following business purposes:

- To respond to inquiries and fulfill your requests.
- To notify you about important information regarding products and services that you applied for or in which you are enrolled.
- To verify your identity.
- To prevent fraud and enhance the security of your account or our online services.
- To manage your preferences.
- To perform analytics of your use of our online services (e.g.: the web pages and advertisements you have viewed).
- To deliver advertisements.
- To internally evaluate and improve our business operations.
- To comply with legal requirements, relevant contractual obligations, and our internal policies.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale of some or all of our assets, whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding, in which personal information is held by us among the assets transferred.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

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



Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

- Category A: Identifiers.
- Category B: California Customer Records personal information categories.
- Category C: Demographic Information.
- Category D: Commercial Information.
- Category F: Internet Activity.
- Category H: Employment Information.
- Category I: Education Information.

We disclose your personal information for a business purpose to the following categories of third parties:

- Our credit union clients or their agents for which you have engaged for a loan.
- Service providers for the purposes of marketing our products/services to you.
- Other service providers, such as data processors to assist in recordkeeping and the administration of your account records.
- Certain third parties to comply with legal requirements, court orders, or to prevent fraud.

Student Choice does not sell your personal information to third parties.

Your Rights and Choices under the CCPA

The CCPA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- 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 or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).

Deletion Request Rights

You have the right to request that we delete any of your personal information we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer



request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
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 information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the data access and data portability rights described above, please submit a verifiable consumer request to us by email at privacy@studentchoice.org.

To exercise the data deletion rights, you may use the email address above or visit our online portal at <https://studentchoice.org/privacy> to submit a data deletion request.

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

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. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.



Response Timing and Format

We will attempt 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. We will deliver our written response by mail or email, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. 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 unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

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

- Deny you goods or services.
- Charge you different rates for goods or services, including by granting discounts or other benefits, or imposing penalties.
- Provide you a different level of quality of goods or services.
- Suggest that you may receive a different price or rate of goods or services or a different quality of goods or services.

Changes to Our Privacy Notice

This Notice is subject to change and will always display the date of the last update. Please review it periodically.

Questions or Concerns about the Privacy Notice for California Residents

If you have any questions or comments about this Notice, the ways we collect and use your personal information, your choices and rights regarding such use, or you wish to exercise your rights under California law, you may contact us via email at: [insert email address here].

Effective Date: 6/25/2021