

Privacy Notice

Rev. 1/2023

FACTS	WHAT DOES LABOR CREDIT UNION DO WITH YOUR PERSONAL FINANCIAL INFORMATION?
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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.
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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"> • <i>Social Security number and income.</i> • <i>Account balances, transaction history, assets, and payment history.</i> • <i>Credit history and credit scores.</i> • <i>Investment experience.</i> <p>When you are no longer our member, we continue to share your information as described in this notice.</p>
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How?	All financial companies need to share customer/member’s personal information to run their everyday business. In the sections below, we list the reasons financial companies can share their customer/member’s personal information; the reasons Labor Credit Union chooses to share; and whether you can limit this sharing.
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Reasons we can share your personal information	Does LCU 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 a credit bureau.	Yes	No
For our marketing purposes — to offer our products and services to you.	Yes	Yes
For joint marketing with other financial companies.	Yes	Yes
For our affiliates’ everyday business purposes — information about your transactions and experiences.	No	We do not share.
For our affiliates’ everyday business purposes — information about your creditworthiness.	No	We do not share.
For affiliates & nonaffiliates to market to you	No	We do not share.

To Limit Sharing	<ul style="list-style-type: none"> • <i>Call (202) 789-2901 and speak to a Member Service Representative</i> • <i>E-mail memberservices@dolfcu.org and put “Opt-Out” in the subject line</i> <p>Please note: If you are a <i>new</i> member, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our member, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p>
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Questions	Call (202) 789-2901 and speak to a Member Service Representative
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Who we are	
Who is providing this notice?	Labor Credit Union P.O. Box 51, Merrifield, VA 22116
What we do	
How does Labor Credit Union protect my personal information?	To protect your personal financial 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.
How does Labor Credit Union collect my personal information?	We collect your personal information, for example when you <ul style="list-style-type: none"> • <i>Open an account or deposit money</i> • <i>Pay your bills or apply for a loan</i> • <i>Use your credit or debit card</i> We also 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 <ul style="list-style-type: none"> • <i>Sharing for affiliates' everyday business purposes — information about your creditworthiness</i> • <i>Affiliates from using your information to market to you</i> • <i>Sharing for nonaffiliates to market to you</i> State laws and individual companies may give you additional rights to limit sharing.
What happens when I limit sharing for an account I hold jointly with someone else?	Your choice will apply to everyone on your account.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. <i>rkGoBig, LLC, a Credit Union Service Organization is partially owned by us.</i>
Non-affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <i>Labor Credit Union does not share with our non-affiliates so they can market to you. Non-affiliates we share with can include mailhouse or consumer reporting agencies.</i>
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you <ul style="list-style-type: none"> • <i>Our joint marketing partners include investment, insurance, and other financial service providers.</i>

You may opt out of receiving marketing information from Labor Credit Union or through its joint marketing agreements. Follow the instructions in the "To Limit Sharing" section of this notice.

Scope and Overview

This policy outlines how Labor Credit Union, its vendors, and/or the licensor of the Labor 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 Labor Credit Union, its vendors, and/or the licensor of the Labor Credit Union's consumer verification software collect, capture, or otherwise obtain biometric data relating to a consumer, Labor Credit Union must first:

- Inform each consumer that Labor Credit Union, its vendors, and/or the licensor of the Labor Credit Union's consumer verification software are collecting, capturing, or otherwise obtaining the employee's biometric data, and that the Labor Credit Union is providing such biometric data to its vendors and the licensor of the Labor 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 Labor Credit Union, its vendors, and/or Labor Credit Union's consumer verification software to collect, store, and use the consumer's biometric data for the specific purposes disclosed by the Labor Credit Union, and for Labor Credit Union to provide such biometric data to its vendors and the licensor of the Labor Credit Union's consumer verification software.
- Labor Credit Union, its vendors, and/or the licensor of the Labor Credit Union's consumer verification software will not sell, lease, trade, or otherwise profit from employees' biometric data; provided, however, that the Labor Credit Union's vendors and the licensor of the Labor Credit Union's consumer verification software may be paid for products or services used by Labor Credit Union that utilize such biometric data.

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

BIOMETRIC INFORMATION PRIVACY POLICY AND CONSENT

Purpose for the Collection of Biometric Data

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

Disclosure

Labor Credit Union will not disclose or disseminate any biometric data to anyone other than its vendors and the licensor of the Labor 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

Labor 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 Labor 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

Labor Credit Union shall retain consumer biometric data only until, and shall request that its vendors and the licensor of Labor 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.

BIOMETRIC INFORMATION PRIVACY POLICY AND CONSENT

Contact Information

If you have any questions about our use, storage, or security of your biometric data you can contact us at: Memberservices@dolfcu.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 Labor Credit Union, its vendors, and/or the licensor of the Labor 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 Labor Credit Union’s procedures and safeguards for collecting, maintaining, using, disclosing, sharing, storing, and/or destroying this data.