

FACTS

WHAT DOES 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 ■ and ■ and <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 personal information to run their everyday business. In the section below, we list the reasons financial companies can share their personal information; the reasons chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does 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		
For our marketing purposes— to offer our products and services to you		
For joint marketing with other financial companies		
For our affiliates' everyday business purposes— information about your transactions and experiences		
For our affiliates' everyday business purposes— information about your creditworthiness		
For nonaffiliates to market to you		

Questions?	Call or go to
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Who we are

Who is providing this notice?

What we do

How does 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 and secured files and buildings.

How does collect my personal information?

We collect your personal information, for example, when you

- or
- or
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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 nonaffiliates 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.

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Nonaffiliates

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

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Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

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Other important information

Effective Date: 10/01/2023

BIOMETRIC INFORMATION PRIVACY POLICY AND CONSENT

Scope and Overview

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

Inform each consumer that VacationLand Federal Credit Union, its vendors, and/or the licensor of VacationLand Federal Credit Union's consumer verification software are collecting, capturing, or otherwise obtaining the consumer's biometric data, and that VacationLand Federal Credit Union is providing such biometric data to its vendors and the licensor of VacationLand Federal 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 VacationLand Federal Credit Union, its vendors, and/or VacationLand Federal Credit Union's consumer verification software to collect, store, and use the consumer's biometric data for the specific purposes disclosed by VacationLand Federal Credit Union, and for VacationLand Federal Credit Union to provide such biometric data to its vendors and the licensor of VacationLand Federal Credit Union's consumer verification software.

VacationLand Federal Credit Union, its vendors, and/or the licensor of VacationLand Federal Credit Union's consumer verification software will not sell,

lease, trade, or otherwise profit from consumers' biometric data; provided, however, that VacationLand Federal Credit Union's vendors and the licensor of VacationLand Federal Credit Union's consumer verification software may be paid for products or services used by VacationLand Federal Credit Union that utilize such biometric data.

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

Purpose for the Collection of Biometric Data

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

Disclosure

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

VacationLand Federal 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 VacationLand Federal 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

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

Contact Information

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