

## **For California Residents:**

Last Updated and Effective: June 09 2020

This Notice supplements American Airlines Federal Credit Union's Privacy Policy for any member that is a California resident. For additional information regarding our general privacy policy, please see the Privacy Notice located on our website on our [Privacy Notice page](#). We reserve the right to amend this Notice at any time in accordance with internal changes or changes to the law. When changes are made, we will post the updates on our website and update the effective date. Any continued use of our products, services, and website following the posting of changes will serve as your acceptance of these changes.

This California Consumer Privacy Policy ("Privacy Policy") applies to any consumer, member, visitor, user and any others who are a "resident" of the State of California as defined under Title 18 of the California Code of Regulations Section 17014 and is meant to comply with the California Consumer Protection Act of 2018 ("CCPA").

This notice explains how we collect, share, use, and protect your personal information through your online and offline interactions with us. This Privacy Policy includes references and links to our other privacy policies that serve different purposes under various laws and regulations that apply to us. Please note that most information we collect is governed by a federal law called the Gramm-Leach-Bliley Act or "GLBA", and as such, the CCPA will not govern all of your interactions with us or the use of your personal information.

### **HOW WE USE YOUR PERSONAL INFORMATION**

We may use or disclose your personal information for the following purposes ("business purpose"):

- To fulfill or meet the reason for which you provided the information. For example, you apply for a loan, and we use the information in your loan application to give you the loan. We may also use this information to for new or future applications or to process requested transactions.
- To provide you with information, products, or services that you request from us.
- To provide you with email alerts, event registrations, or other notices concerning our products or services, 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 presentment of its contents to you.
- For testing, research, or analysis to improve our products and services.
- 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 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.

We also use your personal information to advance our commercial and economic interests (“commercial purpose”), such as advertising our membership, products and services, or enabling or effecting, directly or indirectly, a commercial transaction. We will not collect additional categories of personal information or use the personal information collected for materially different, unrelated, or incompatible purposes without providing you notice.

### **INFORMATION WE COLLECT**

American Airlines Federal Credit Union may collect, or has collected, the following categories of personal information (please note that some categories overlap or may not apply to the financial services you obtained from us):

<b>Category</b>	<b>Examples</b>
A. Identifiers	Name or alias; mailing and email addresses; signature; home phone number or mobile phone number; financial account numbers, credit card number, debit card number, or other financial information; physical characteristics or description; account name; tax identification number; driver's license number or state identification card number; passport number; or other similar identifiers.
B. Protected classification characteristics under state or federal law	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, and veteran or military status.
C. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
D. Biometric information	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 or other physical traits or patterns.
E. Internet or other similar network activity	Browsing history, emails, 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; 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. Professional or employment-related information.	Current or past job history, performance evaluations, disability accommodations, and complaint records.
I. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Educational 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.
J. Inferences drawn from other personal information.	Profile reflecting a person's preference, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Personal Information does not include publicly available information; de-identified or aggregated consumer information; or other information excluded from the CCPA.

**CATEGORIES OF SOURCES OF INFORMATION WE COLLECT**

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

- **Direct from you or your agent:** We collect information directly from you or your authorized agent. For example, when you provide us your name and tax identification number to open an account and become a member.
- **Indirectly from you:** We collect certain information from your activity on our website ([www.aacreditunion.org](http://www.aacreditunion.org)) and your use of applications on your mobile device. We collect your IP address, device and advertising identifiers, browser type, operating system, Internet service provider (“ISP”), pages that you visit before and after visiting our website, the date and time of your visit, information about the links you click and pages you view on our website, and other standard server log information. We may also collect your mobile device’s GPS signal, location, or other information about nearby Wi-Fi access points and cell towers. In addition, we may deploy and use cookies, web beacons, local shared objects, and other tracking technologies for various purposes, such as fraud. Some of these tracking tools may detect characteristics or settings of the specific device you use to access our online services. These cookies are not used to engage in online behavioral advertising.
- **Third-party service providers in connection with our services or our business purposes:** We collect information from third-party service providers that interact with us in connection with the services we perform or for our operational purposes. For example, a credit report we obtain from a credit bureau to evaluate a loan application. Another example is a third-party service provider that provides us information to help us detect security incidents and fraudulent activity.
- **Information we collect from third-parties for a commercial purpose:** We collect information from third-parties for our commercial purposes. We partner with a limited number of third-party analytics and advertising firms. These third parties may use cookies or code processed by your browser to collect public information about your visits to our and other websites in order to provide customized experiences or services. We do not disclose any information about you to such third-parties except as permitted by applicable laws and regulations, and we require such third-parties to follow applicable laws and regulations when they collect information from you to transfer such information to us.

## **SHARING PERSONAL INFORMATION**

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

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

- Category A: Identifiers
- Category B: Personal information categories listed in the (Cal. Civ. Code § 1798.80(e))
- Category C: Protected classification characteristics under state or federal law
- Category D: Commercial Information
- Category E: Biometric Information
- Category F: Internet or other similar network activity
- Category G: Geolocation Data
- Category H: Sensory Data
- Category I: Professional or employment-related information
- Category J: Non-public education information
- Category K: Inferences drawn from other personal information

We do not sell your personal information for monetary consideration. In the preceding 12-months, we have not sold any personal information and, going forward, we will not sell your information. If this changes, we will notify you in accordance with applicable law. We will not sell, and to our knowledge have not sold, the personal information of minors under 16 years of age without authorization from a parent or legal guardian.

## **YOUR RIGHTS AND CHOICES**

This section describes your rights and choices under the CCPA 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.

### ***Access to Specific Information and Data Portability Rights***

If an exception does 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 over the past 12 months from the date we receive your request. 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 or selling that personal information.

- The categories of third parties to whom we sold or disclosed the category of personal information.
- The business or commercial purpose for which we sold or disclosed the category of 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”).

### ***Deletion Request Rights***

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

- 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.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
- 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.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### ***Right of Correction***

You have the right to request changes to any of your personally identifiable information that we have collected through our website and online services.

### ***Exercising Access, Data Portability, Deletion and Correction Rights***

To exercise the access, data portability, deletion and correction rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 800-533-0035
- Mail: Attn: Legal Department, P.O. Box 619001, MD 2100, DFW Airport, TX, 75261-9001

Only you or someone legally authorized 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. We will follow our normal member verification procedures to ensure the safety of your data.

You may only make a verifiable consumer request for access or data portability 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. 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.

When we receive a verifiable request from your or your authorized agent, we will require:

1. Submission of a written document signed by you with your permission for the authorized agent to submit a verifiable request on your behalf and require the authorized agent to verify its own entity to us; or
2. Require your authorized agent to furnish a copy of a power of attorney pursuant to California Probate Code sections 4000 to 4465 and require the authorized agent to verify its own identity to us.

We will deny a request from an agent that does not submit proof that they have been authorized by you to act on your behalf and cannot verify their own identity to us.

### ***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. If you have an account with us, we will deliver our written response to the email or physical address associated with that account. If you do not have an account with us, we will deliver our written response by mail or electronically, 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.

### ***Right of Non-Discrimination***

We will not discriminate against you for exercising any of your rights in this Privacy Policy 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.

### **DO NOT TRACK (“DNT”) SIGNALS**

Currently, the standards regarding the DNT signals and appropriate responses are not defined. As a result, we do not respond to DNT signals generally except, however, we will treat DNT signals from user-enabled privacy controls, such as a browser plug in or privacy setting or other mechanism, that communicate or signal your choice to opt-out of the sale of your personal information as a valid request to opt-out of the sale of personal information for that browser or device, or, if identifiable, the consumer's personal information.

Please note that information you send to us electronically may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential information (such as your Social Security number) to us.