



**FACTS** **WHAT DOES PENINSULA FEDERAL CREDIT UNION 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?** The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and credit card or other debt
- credit history and credit scores
- overdraft history and payment history

**How?** All financial companies need to share members' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their members' personal information; the reasons Peninsula Federal Credit Union chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Peninsula Federal Credit Union share?	Can you limit this sharing?
<b>For our everyday business purposes –</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or to report to credit bureaus	Yes	No
<b>For our marketing purposes –</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes –</b> information about your transactions and experiences	Yes	Yes
<b>For our affiliates' everyday business purposes –</b> information about your creditworthiness	Yes	Yes
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For nonaffiliates to market to you</b>	No	We don't share

**To limit our sharing**

- Call toll-free 1-888-791-6420 - our menu will prompt you through your choice(s),
- Visit us online: [www.peninsulafcu.com](http://www.peninsulafcu.com) or
- Mail the form below

**Please note:**  
If you are a *new* member, we can begin sharing your information 30 days from the date we sent this notice. When you are *no longer* 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.

**Questions?** Call toll-free 1-888-791-6420 or go to [www.peninsulafcu.com](http://www.peninsulafcu.com)

✂-----Detach and mail form below. Retain Disclosure above for your records.-----

Mail-in Form		
Mark any/all you want to limit: <input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purpose. <input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.		
Name		<b>Mail to:</b> Peninsula Federal Credit Union 2929 3rd Avenue North Escanaba, MI 49829
Address		
City, State Zip		
Account #		

What we do	
<b>How does Peninsula Federal Credit Union protect my personal information?</b>	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.
<b>How does Peninsula Federal Credit Union collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>▪ open an account or provide your mortgage information</li> <li>▪ apply for financing or give us your contact information</li> <li>▪ give us your wage statements</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>▪ sharing for affiliates' everyday business purposes – information about your creditworthiness</li> <li>▪ affiliates from using your information to market to you</li> <li>▪ sharing for nonaffiliates to market to you</li> </ul> <p>State law and individual companies may give you additional rights to limit sharing.</p>
<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices will apply to everyone on your account.

Definitions	
<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>Our affiliates include companies with a Xtend, Inc. name.</i></li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>Peninsula Federal Credit Union does not share with our nonaffiliates so they can market to you.</i></li> </ul>
<b>Joint Marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>▪ <i>Our joint marketing partners include loan recapture programs and insurance companies.</i></li> </ul>

Other important information

**Effective Date: 07/15/2023**

## **BIOMETRIC INFORMATION PRIVACY POLICY AND CONSENT**

### **Scope and Overview**

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

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

Peninsula Federal Credit Union, its vendors, and/or the licensor of the Peninsula Federal Credit Union's consumer verification software will not sell, lease, trade, or otherwise profit from employees' biometric data; provided, however, that the

Peninsula Federal Credit Union's vendors and the licensor of the Peninsula Federal Credit Union's consumer verification software may be paid for products or services used by Peninsula 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**

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

**Disclosure**

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

Peninsula 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 Peninsula 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**

Peninsula Federal Credit Union shall retain consumer biometric data only until, and shall request that its vendors and the licensor of Peninsula 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: [memservice@peninsulafcu.com](mailto:memservice@peninsulafcu.com).

**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 Peninsula Federal Credit Union, its vendors, and/or the licensor of the Peninsula 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 the Peninsula Federal Credit Union's procedures and safeguards for collecting, maintaining, using, disclosing, sharing, storing, and/or destroying this data.