



<b>FACTS</b>	<b>WHAT DOES COPPER FINANCIAL NETWORK, LLC (“COPPER FINANCIAL”) DO WITH YOUR PERSONAL INFORMATION?</b>
<b>Why?</b>	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.
<b>What?</b>	The types of personal information we collect can include: - Social Security number      - Investment experience and assets - Income                                - Account transactions and holdings
<b>How?</b>	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons Copper Financial chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Copper Financial 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 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	No
<b>For our affiliates’ everyday business purposes</b> - Information about your creditworthiness	No	We don’t share
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For nonaffiliates to market to you</b>	No	We don’t share

<b>To limit our sharing</b>	<p>Call us at (888) 695-3477.</p> <p><b>Please note:</b></p> <p>If you are a <i>new</i> client, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our client, we continue to share your information as described in this notice.</p>
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<b>Questions?</b>	Call (888) 695-3477 or go to <a href="https://cu.financial/privacy">cu.financial/privacy</a> .
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Who we are	
<b>Who is providing this notice?</b>	Copper Financial
What we do	
<b>How does Copper Financial protect my personal information?</b>	<p>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.</p> <p>In addition to physical and electronic safeguards, we have implemented security standards and procedures to protect your information, including employee training, limited employee access and the use of confidentiality agreements.</p>
<b>How does Copper Financial 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</li> <li>- Apply for insurance</li> <li>- Seek advice about your investments and execute transactions</li> <li>- Move money in or out of your account</li> <li>- Tell us about your investment or retirement portfolio</li> </ul> <p>We also collect your personal information from 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><b>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</b></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 CommunityAmerica Federal Credit Union; financial companies such as CommunityAmerica CUSO One, LLC; TruHome Solutions, LLC; CommunityAmerica Insurance Agency, LLC.</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>Copper Financial does not share with 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 financial services companies (such as credit unions with whom we have agreements to jointly market financial products)</i></li> </ul>



## Other Important Information

### California Residents:

Certain residents of California, in addition to other rights described in this Privacy Policy, have the following rights:

- To request that we disclose what personal information relating to you that we collect, share, or sell.
- To request that we delete certain personal information relating to you that we maintain.
- To opt-out from the sale by a business of your personal information.
- To make such a request relating to these California rights, please navigate to navigate to [cu.financial/privacy-request](https://cu.financial/privacy-request) or contact us at [investments@cu.financial](mailto:investments@cu.financial).
- We may need to obtain information about you or your specific request to verify and respond. If you have an authorized agent, that person also may submit requests relating to your California privacy rights. We will need to obtain verification of the agent's identity, their authority to act on your behalf, and verification that you are the individual about whom Copper Financial possesses the personal information requested.

A business may not discriminate against a California resident that exercises their privacy rights under state law.

### Vermont Residents:

In accordance with Vermont law, we will not disclose information about your creditworthiness to our affiliates and will not disclose your personal information, financial information, credit report or health information to nonaffiliated third parties to market to you, other than as permitted by Vermont law, unless you authorize us to make those disclosures. Additional information concerning our privacy policies can be found at [cu.financial/privacy](https://cu.financial/privacy) by calling 888.695.3477.

### Nevada Residents:

In accordance with Nevada law, if you would like to be placed on our Internal Do Not Call List, please call 888.695.3477. For more information, you may contact [investments@cu.financial](mailto:investments@cu.financial) or 9777 Ridge Drive, Suite 360 Lenexa, KS 66219, or the Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington Street, Suite 3900, Las Vegas, NV 89101. Phone number: 702.486.3132; [BCPINFO@ag.state.nv.us](mailto:BCPINFO@ag.state.nv.us).

### Individuals in the European Union ("EU"):

In this section, we provide additional information relating to how we process Personal Information of individuals in the EU, in accordance with the GDPR. If you need more information or would like to exercise your rights under the GDPR, you may contact us at [investments@cu.financial](mailto:investments@cu.financial).

#### *Basis for Processing*

Our legal basis for collecting and using the Personal Information described in this Privacy Policy will depend on the Personal Information concerned and the context in which we collect it. We collect Personal Information from you:

- where we need it to perform a contract with you;
- where the processing is in our legitimate interests (including the purposes described, above, in "How We Use Personal Information"); or
- if we otherwise have your consent.

#### *Your Privacy Rights*

Depending on applicable law, you may have the right to:

- **Request access** to Personal Information about you.
- **Request correction** of the Personal Information that we hold about you.
- **Request erasure** of Personal Information about you. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which we will advise you of, if applicable, at the time of your request.
- **Object to processing** of Personal Information about you where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- **Request restriction of processing** of Personal Information about you. You can ask us to suspend the processing of Personal Information in the following scenarios: (a) if you want us to establish the data's



accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Request the transfer** of Personal Information to you or to a third party.
- **Withdraw consent** at any time where we are relying on consent to process Personal Information about you.

If you wish to exercise any of these applicable rights, please navigate to [cu.financial/privacy-request](https://cu.financial/privacy-request) or contact us at [investments@cu.financial](mailto:investments@cu.financial).

Depending on where you live, you may have a right to lodge a complaint with a supervisory authority or other regulatory agency if you believe that we have violated any of the rights concerning Personal Information. We encourage you to first reach out to us at [investments@cu.financial](mailto:investments@cu.financial), so we have an opportunity to address your concerns directly before you do so.

#### *Transfers to the U.S.*

If you are transferring data from outside the United States, please be aware that Personal Information will be transferred to, stored, and processed in the United States. Although we take steps to provide adequate safeguards, the data protection laws of the United States might not be as comprehensive as those in your country.

We endeavor to apply suitable safeguards to protect the privacy and security of Personal Information transferred to us in the United States, and to use it only consistent with your relationship with us and the practices described in this Privacy Policy.