

NORTHWEST FARM CREDIT SERVICES, PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

Effective Date: December 30, 2019

Last Reviewed on: December 30, 2019

This Privacy Notice for California Residents is a supplement to Northwest FCS’ Information Privacy Statement and is applicable only to individuals who are California residents (“consumer” or “you”). Northwest FCS (“we” or “us”) has posted this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and any terms defined in the CCPA have the same meaning when used in this notice.

Notice of Information Northwest FCS Collects

Northwest FCS collects the categories of personal information about you online and offline as listed below. All of the categories of personal information we collect about you come from the following categories of sources:

- You, including through your use of our services or website.
 - Example: From applications or documents that you provide related to the type of service or engagement we have with you.
- Directly and indirectly from website activity on www.northwestfcs.com.
 - Example: From interactions or submissions via our website pages, or website usage details collected automatically as defined in the Northwest FCS Privacy Statement.
- From service providers and vendors we engage with to provide products or services to you or to enable us to provide products and services to you.
 - Example: From credit reporting agencies to enable us to provide financing and other products and services.
- From our affiliate companies and strategic partners including other farm credit system institutions with whom you may conduct business.

Category of Personal Information	Purposes for Collecting Information
A. Identifiers (such as name, alias address, unique personal identifiers, driver’s license number, social security number, passport number or other similar identifiers)	To fulfill operational and commercial purposes for which the information was collected including: <ul style="list-style-type: none"> • providing financing, insurance and other related products; • maintaining or servicing customer accounts; • processing requests, purchases, transactions, and payments; • providing customer service; • processing and accounting for payments and disbursements;
B. Other Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e) such as name, telephone number, signature, insurance policy number, education, employment history, financial information). Some information in this	

Category of Personal Information	Purposes for Collecting Information
category may overlap with other categories	<ul style="list-style-type: none"> • verifying or maintaining the quality of services or products; • engaging in advertising or marketing activities;
C. Protected classification characteristics under California or federal law (such as age, race, color ancestry, national origin, citizenship, gender, marital status, veteran or military status)	<ul style="list-style-type: none"> • producing company publications and marketing materials to communicate our products and services to potential customers*; • enabling commercial transactions with potential customers; • providing analytic services;
D. Commercial information (such as transaction data or purchasing or consuming histories or tendencies)	<ul style="list-style-type: none"> • verifying customer, employee or prospective employee information; • auditing for compliance with federal and state regulations and laws;
E. Biometric information (such as fingerprints, faceprints, and voiceprints)	<ul style="list-style-type: none"> • auditing related to current interaction with you and concurrent transactions including, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions and auditing compliance with this specification and other standards;
F. Internet or other similar network activity (such as browsing history or search history)	<ul style="list-style-type: none"> • detecting security incidents and protecting against malicious, deceptive, fraudulent or illegal activity;
G. Geolocation data (physical location)	<ul style="list-style-type: none"> • debugging to identify and repair errors that impair existing intended functionality;
H. Sensory Data (Audio, electronic or visual information)	<ul style="list-style-type: none"> • undertaking internal research for technological development and demonstration • fulfilling regulatory reporting and requirements;
I. Profile Building Inferences	<ul style="list-style-type: none"> • responding to law enforcement requests and as required by applicable law, court order, or governmental regulations;
J. Professional or employment-related information	<ul style="list-style-type: none"> • activities as described to you when collecting your personal information.

*Note concerning Biometric and Sensory Data. Northwest FCS does not collect this information for commercial/marketing purposes without your knowledge and prior consent.

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Certain personal information protected by other sector-specific federal or California statutes like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - personal information covered by the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA), the California Financial Information Privacy Act (FIPA), the Driver's Privacy Protection Act of 1994, or The Farm Credit Act of 1971.

Northwest FCS will not collect additional categories of personal information or use the personal information collected for substantively different or unrelated purposes without notifying you.

Sharing Personal Information

We may disclose your personal information to a service provider or third party for a business purpose. When we disclose personal information for a business purpose, we enter into a written contract describing the purpose for the engagement and requiring that the recipient of any personal information keep that personal information confidential and not use it for any purpose except for performing the services identified in the contract.

We share your personal information with the following categories of third parties:

- Business partners
- Service providers
- Affiliates
- Third Parties to whom you or your agents authorize us to disclose your personal information in connection with products or services Northwest FCS provides to you
- External Marketing Entities
- Law Enforcement/Legal Requests
- Advertising Networks
- Data Analytics Providers
- Government Entities
- Research/Academics
- Operating System Platforms
- Social Networks

Disclosures of Personal Information for a Business Purpose.

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

Category A - Identifiers

Category B – California Consumer Records Personal Information Categories

Category C – Protected Classification Characteristics Under California or federal law

Category D – Commercial Information

Category E - Biometric Information

Category F - Internet or Other Similar Network Activity Information

Category I – Profile Building inferences

Category J – Professional and Employment-Related Information

Sales of Personal Information.

In the preceding twelve (12) months, we have not sold any personal information.

California Resident Rights and Options

The CCPA affords California residents specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

The Right to Access Specific Information and Data Portability Rights.

You have the right to request us to disclose to you any one or more of the following pieces of information about our collection and use of your personal information over the past 12 months.

- The categories of personal information we collected about you.
- The categories of sources from which we collected the personal information.
- The business or commercial purposes for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you in a readily usable format that you can transmit, if that is part of your data request.
- If we sold or disclosed your personal information for a business purpose, separate lists disclosing:
 - For sales, a list identifying the personal information categories that each category of recipient purchased; and
 - For disclosures for a business purpose, a list identifying the personal information categories that each category of recipient obtained.

Once we receive your request (see [How to Submit a Request](#)), we will confirm our receipt of your request within ten days of receipt and explain how we will verify your identity and when you may expect a response.

The Right to Delete Your Personal Information

You have the right to request us to delete your personal information collected from you and retained, subject to certain exceptions. After we verify your request and identity, we will delete your personal information from our system records unless an exception applies. Northwest FCS will also direct our service providers to delete from their records any of your personal information they have received from us.

How to Submit a Request

To exercise access, data portability and deletion rights described above, please submit your request in one of the following ways:

- Call toll-free and speak with Northwest FCS customer service at 866-552-9172 (choose option 5).
- Submit a request using our interactive web form located on our website at <https://www.northwestfcs.com/about-us/privacy-security/california-privacy-policy-request>

Only you, or someone legally authorized to act on your behalf (“authorized agent”), 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 may require you to provide us with written permission for the authorized agent to make the request and may require the authorized agent to verify their own identity to us, unless you have provided us with a power of attorney under California Probate Code Section 4000 to 4465.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period.

The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Northwest FCS reserves the right to seek additional information from the requestor to clarify any consumer data access request.

Northwest FCS will only use personal information provided in a verifiable consumer data access request to verify the authorized requestor’s identity and authority to make the request.

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.

Responding to Requests to Know or Requests to Delete

Northwest FCS will confirm receipt of your request to know or delete within ten days and provide you information about how we will process the request, including our verification process and when you should expect a response.

Northwest FCS strives to respond to verifiable consumer requests within 45 days of having been received. If additional time is required, we may extend the fulfillment of the request up to 90 days. If this happens, Northwest FCS will notify you of the reason and extension period in writing either by mail or electronically, by your choice.

The response we provide will also explain the reasons we cannot comply with a request, if applicable.

Disclosures will be made in writing or electronically at your option. 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.

For validated data deletion requests not subject to exceptions, Northwest FCS will delete your personal information from our system records. Northwest FCS will also direct our service providers to delete from their records any of your personal information they have received from us.

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.

The Right to Opt-Out and Opt-In of the Sale of Your Personal Information

Northwest does not sell personal information to third parties.

The Right to Non-Discrimination

Northwest FCS will not discriminate against any individual for exercising any CCPA rights. Unless permitted by the CCPA, Northwest FCS will not:

- Deny such individuals goods or services.
- Charge such individuals different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide such individuals a different level or quality of goods or services.
- Suggest that such individuals may receive a different price or rate for goods or services or a different level or quality of goods or services.

Changes to Our Privacy Notice

Northwest FCS reserves the right to revise this Privacy Notice periodically as required. We will review and update it at least annually. When changes to this privacy notice are made, the revised version of the notice will be posted with the revision date, on the Northwest FCS website, www.northwestfcs.com.

Contact Information

Please direct questions or comments about this or any Northwest FCS privacy notices, or any of the rights afforded by the CCPA under California law to Northwest FCS. Additionally, if you wish to exercise any of these rights, please contact Northwest FCS at:

Phone: 866-552-9172 (choose option 5).

Website: www.northwestfcs.com

Email: CentralServicing@northwestfcs.com

Northwest FCS
Attention: Central Servicing
2001 S. Flint Road
Spokane, Washington 99220