

FACTS

WHAT DOES TORO 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: <ul style="list-style-type: none"> • Social Security number and credit scores • account balances and payment history • credit history and checking account information <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 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 Toro Credit Union chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Toro Credit Union 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	YES	NO
For our marketing purposes — to offer our products and services to you	YES	NO
For joint marketing with other financial companies	YES	YES
For our affiliates' everyday business purposes — information about your transactions and experiences	NO	We don't share
For our affiliates' everyday business purposes — information about your creditworthiness	NO	We don't share
For nonaffiliates to market to you	NO	We don't share

To limit our sharing	<ul style="list-style-type: none"> • Call (800) 525-0051 — our menu will prompt you through your choice(s) • Visit us online: www.torofcu.org or • Mail the form below <p>Please note:</p> <p>If you are a <i>new</i> member, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our member, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
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Questions?	Call (800) 525-00511 or go to www.torofcu.org
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Mail-in Form										
<p>Leave Blank OR</p> <p>If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.</p> <p><input type="checkbox"/> Apply my choices only to me</p>	<p>Mark any/all you want to limit:</p> <p><input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes.</p> <p><input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.</p> <p><input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.</p> <table border="1"> <tr> <td>Name</td> <td></td> <td rowspan="4"> Mail to: Toro Credit Union 8111 Lyndale Ave. South Bloomington, MN 55420 </td> </tr> <tr> <td>Address</td> <td></td> </tr> <tr> <td>City, State, Zip</td> <td></td> </tr> <tr> <td>Account Number</td> <td></td> </tr> </table>	Name		Mail to: Toro Credit Union 8111 Lyndale Ave. South Bloomington, MN 55420	Address		City, State, Zip		Account Number	
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Who we are	
Who is providing this notice?	Toro Federal Credit Union (TORO FCU)
What we do	
How does Toro FCU 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 Toro FCU collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • open an account or apply for a loan • give us your income information or show us your driver's license • make deposits or withdrawals from your account <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> • 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 <p>State laws and individual companies may give you additional rights to limit sharing.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account—unless you tell us otherwise.
Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • <i>We don't have any affiliates</i>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • <i>Insurance companies and Data Processors</i> • <i>Plastic card processors (Credit, Debit, or ATM cards)</i> • <i>Financial statement printers</i> • <i>Consumer reporting agencies</i>
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • <i>Trustage Insurance</i>

Effective Date: June 15, 2023

BIOMETRIC INFORMATION PRIVACY POLICY AND CONSENT

Scope and Overview

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

- Inform each consumer that Toro Credit Union, its vendors, and/or the licensor of the Toro Credit Union's consumer verification software are collecting, capturing, or otherwise obtaining the employee's biometric data, and that the Toro Credit Union is providing such biometric data to its vendors and the licensor of the Toro 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 Toro Credit Union, its vendors, and/or Toro Credit Union's consumer verification software to collect, store, and use the consumer's biometric data for the specific purposes disclosed by the Toro Credit Union, and for Toro Credit Union to provide such biometric data to its vendors and the licensor of the Toro Credit Union's consumer verification software.
- Toro Credit Union, its vendors, and/or the licensor of the Toro Credit Union's consumer verification software will not sell, lease, trade, or otherwise profit from employees' biometric data; provided, however, that the Toro Credit Union's vendors and the licensor of the Toro Credit Union's consumer verification software may be paid for products or services used by Toro 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

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

Disclosure

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

Toro 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 Toro 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

Toro Credit Union shall retain consumer biometric data only until, and shall request that its vendors and the licensor of Toro 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: memberservices@torofcu.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 Toro Credit Union, its vendors, and/or the licensor of the Toro 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 Toro Credit Union's procedures and safeguards for collecting, maintaining, using, disclosing, sharing, storing, and/or destroying this data.