# Credit Union ONE Online Privacy Policy

Last updated- June, 2016

This Online Privacy Policy (Policy) applies to this Credit Union ONE online interface (i.e., website or mobile application) and any Credit Union ONE affiliate or subsidiary online interface that links to this Policy, (each, a Site, and, collectively, Sites). The term "Credit Union ONE" or "we" or "us" or "our" in this Policy refers to affiliates or subsidiaries of Credit Union ONE that link to this Policy. This Policy describes how Sites may collect, use and share information from or about you, and explains how information may be collected and used for advertising purposes.

For account holders and visitors to this Site, we will use and share any information that we collect from or about you in accordance with the Credit Union ONE Privacy Notice, which provides choices in the use and sharing of information.  By using the Site, you agree to the terms and conditions of this Policy.

## Collecting and Using Information

**Personal Information We Collect Online**

Personal Information means personally identifiable information such as information you provide via forms, surveys, applications or other online fields including name, postal or email addresses, telephone, fax or mobile numbers, or account numbers.

We will never ask for confidential information, including requests that you provide electronic banking credentials, in an unsolicited email or phone call.

**How We Use Personal Information**

We may use Personal Information:

- to respond to your inquiries and fulfill your requests;
- to inform you about important information regarding the Site, products or services for which you apply or may be interested in applying for, or in which you are already enrolled, changes to terms, conditions, and policies and/or other administrative information;
- to deliver marketing communications that we believe may be of interest to you, including, ads or offers tailored to you;
- to personalize your experience on the Site;
- to allow you to apply for products or services (e.g., to prequalify for a mortgage, apply for a credit card, or to open a retirement account, investment account or other financial product) and evaluate your eligibility for such products or services;
- to verify your identity and/or location (or the identity or location of your representative or agent) in order to allow access to your accounts, conduct online transactions and to maintain measures aimed at preventing fraud and protecting the security of account and Personal Information;
- to allow you to participate in surveys and other forms of market research, sweepstakes, contests and similar promotions and to administer these activities. Some of these activities have additional rules, which may contain additional information about how Personal Information is used and shared;
- to allow you to use some Site financial planning tools. Information that you enter into one of these planning tools may be stored for future access and use. You have the option not to save the information;
- collected through our social media pages and other online interactions with you to assist in verifying your identity and account status. We may combine this online information with information collected from offline sources or information we already have;

- for business purposes, including data analysis, audits, developing and improving products and services, enhancing the Site, identifying usage trends and determining the effectiveness of promotional campaigns;
- for risk control, for fraud detection and prevention, to comply with laws and regulations, and to comply with other legal process and law enforcement requirements;
- to allow you to utilize features within our Sites by granting us access to information from your device such as contact lists, or geo-location when you request certain services.

**How Personal Information is Shared**

Please see the Credit Union ONE Privacy Notice for information on how Personal Information may be shared and how you may be able to limit certain types of sharing.

**Other Information We Collect Online**

Other Information is any information other than Personal Information that does not reveal your specific identity or does not directly relate to an individual, such as browser information, information collected through cookies (see our Cookie Guide below), pixel tags and other technologies, demographic information, other information provided by you such as your date of birth or household income, and aggregated and de-identified data.

**How We Collect and Use Other Information**

We and our third-party service providers may collect and use Other Information in a variety of ways, including:

- **Through your browser or device:** Certain information is collected by most browsers and/or through your device, such as your Media Access Control (MAC) address, device type, screen resolution, operating system version and internet browser type and version. We use this information to ensure Sites function properly, for fraud detection and prevention, and security purposes.
- **Using cookies:** Cookies are pieces of information stored directly on the device you are using. Cookies we use do not contain or capture unencrypted Personal Information. Cookies allow us to collect information such as browser type, time spent on the Site, pages visited, language preferences, and your relationship with us. We use the information for security purposes, to facilitate navigation, to display information more effectively, to personalize/tailor your experience while engaging with us, and to recognize your device to allow your use of our online products and services. We collect statistical information about the usage of the Site in order to continually improve the design and functionality, to monitor responses to our advertisements and content, to understand how account holders and visitors use the Site and to assist us with resolving questions regarding the Site. We also utilize cookies for advertising purposes. Please see the **Advertising** section below for more information. You can refuse to accept these cookies and most devices and browsers offer their own privacy settings for cookies. You will need to manage your cookie settings for each device and browser you use. However, if you do not accept these cookies, you may experience some inconvenience in your use of the Site and some online products and services. For example, we will not be able to recognize your device and you will need to answer a challenge question each time you log on. You also may not receive tailored advertising or other offers from us that may be relevant to your interests and needs. This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services

relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

- **Other technologies including pixel tags, web beacons, and clear GIFs:** These may be used in connection with some Site pages, downloadable mobile applications and HTML-formatted email messages to measure the effectiveness of our communications, the success of our marketing campaigns, to compile statistics about usage and response rates, to personalize/tailor your experience while engaging with us online and offline, for fraud detection and prevention, for security purposes, for advertising, and to assist us in resolving account holders' questions regarding use of our Site. Please see our **Advertising** section below for more information regarding our use of other technologies.

- **Flash objects:** As part of our solutions for online authentication, we use Flash objects (sometimes referred to as "Local Shared Objects") to help us recognize you and your device when you come back to the Site. For our pages running Adobe® Flash® content (demos and tutorials with moving content), we use Flash objects to determine your browser type and version of Adobe Flash in order for you to view the content. We do not use Flash objects for any online behavioral advertising purpose. Deleting cookies does not delete Flash objects. You can learn more about Flash objects - including how to control and disable them - through the Adobe interface. If you choose to disable Flash objects from our Site, then you may not be able to access and use all or part of the Site or benefit from the information and services offered.

- **IP Address:** Your IP Address is a number that is automatically assigned to the device that you are using by your Internet Service Provider (ISP). An IP Address is identified and logged automatically in our server log files whenever a user visits the Site, along with the time of the visit and the page(s) that were visited. Collecting IP Addresses is standard practice on the internet and is done automatically by many web sites. We use IP Addresses for purposes such as calculating Site usage levels, helping diagnose server problems, to personalize/tailor your experience while engaging with us online and offline, for compliance and security purposes, for advertising, and administering the Site. Please see the **Advertising** section below for more information.

- **Aggregated and De-identified Data:** Aggregated and De-identified Data is data that we may create or compile from various sources, including but not limited to accounts and transactions. This information, which does not identify individual account holders, may be used for our business purposes, which may include offering products or services, research, marketing or analyzing market trends, and other purposes consistent with applicable laws.

## Additional Information

**Advertising**

Credit Union ONE advertises online (e.g., pages within our Sites and mobile apps through our managed social media presences, and on other sites and mobile apps not affiliated with Credit Union ONE) and offline (e.g. through call centers and direct marketing). In order to understand how advertising performs, we may collect certain information on our Sites and other sites and mobile apps through our advertising service providers using cookies, IP addresses, and other technologies. The collected information may include the number of page visits, pages viewed on our Sites, search engine referrals, browsing activities over time and across other sites following your visit to one of our Sites or apps, and responses to advertisements and promotions on the Sites and on sites and apps where we advertise.

Credit Union ONE uses information described in this Policy to help advertise our products and services, including prescreened offers of credit, in a variety of ways. We use such information to:

- Present tailored ads, to you including:
  - Banner ads and splash ads that appear as you sign on or off of your online accounts on our Sites, within mobile banking and other mobility applications
  - E-mail, postal mail, and telemarketing, and,
  - On other sites and mobile apps not affiliated with Credit Union ONE;
- Analyze the effectiveness of our ads; and
- Determine whether you might be interested in new products or services

**How we tailor ads:**

**Relationship based advertising**

In order to help make our advertising informative and useful, we may use information about your relationship with us (such as types of accounts or transactional information) to help determine which advertisements or offers to present to you.

**Online Behavioral Advertising**

We or our advertising service providers may use certain information about your activities on our Sites, such as pages visited and search key words entered to help determine which of our advertisements or offers may be of interest to you. We limit access and collection of information for specific purposes by advertising service providers. We may use this online information for online and offline advertising.

**Advertising on third party sites and mobile apps**

Credit Union ONE contracts with advertising companies to advertise our products and services on sites and mobile apps not affiliated with us. We may use Aggregated and De-identified Data and information provided by you to these third party sites and mobile apps to select which of our advertisements or offers may appeal to you, display them to you and monitor your responses. Third Party sites and mobile apps are not subject to our Privacy Policy. Please visit the individual sites and mobile apps for additional information on their data and privacy practices and opt out policies.

**Online Behavioral Advertising on third party sites and mobile apps**

Some of our tailored ads are online behavioral advertising, and may be served using data collected by third party providers. Ads served on our behalf by these companies do not contain unencrypted Personal Information and we limit the use of information by companies that serve our ads. To learn more about this practice and your choices in connection with it, see the section **Advertising Choices** below

## Advertising Choices

You may set your choices for advertising in the following ways:

**Online Behavioral Advertising:** If you prefer we not use information based on online Site behavior to provide online and offline tailored content and advertising, you may opt out of online behavioral advertising.

Opting out also means that the online content and advertising you receive on our non-servicing sites (i.e. before sign-in) will be untailored and will not be based on your online behavior or your relationship.

Please note that if you opt out of this advertising, you may still receive untailored advertising from Credit Union ONE. When accessing online account servicing areas (i.e. after sign-in), you may receive tailored content and advertising based on your account relationships. In addition, we may continue to use

information collected online as described in this Notice to provide details on products and services in accordance with account agreements. See **Important Reminder** section below.**Credit Union ONE Managed Direct Marketing:** If you prefer we not deliver you marketing offers in email, postal mail or through telemarketing you may manage your direct marketing choices online or:

- by telephone at **800.451.4292** -our menu will prompt you through the choices,
- through your assigned account representative (e.g., Mortgage Loan Officer) or a representative at a banking center

**Advertising on third party sites:** Credit Union ONE participates in the Digital Advertising Alliance (DAA) self-regulatory program, uses the Advertising Options Icon on our behavioral ads on third party sites (excluding ads appearing on platforms that do not accept the icon) and adheres to the DAA self-regulatory Principles for Online Behavioral Advertising. Anyone receiving a behavioral ad may click on the displayed icon to receive more information and can opt out at that time or by visiting the third party site's privacy policy for an opt out mechanism.

You may also opt out of receiving behavioral ads from many sites through the Network Advertising Initiative's Opt-Out Tool or other tools provided by the publishing platform.

Please note that if you opt out, you may still receive untailored online advertising from Credit Union ONE. Opting out from a specific third party site means that the ads you receive will not be tailored based on your choices or behavior.

**Important Reminder**

In order for online behavioral advertising opt outs from our Sites and on other sites to work on your device, your browser must be set to accept cookies. If you delete cookies, buy a new device, access our Site or other sites from a different device, login under a different screen name, or change web browsers, you will need to opt-out again. If your browser has scripting disabled, you do not need to opt out, as online behavioral advertising technology does not work when scripting is disabled. Please check your browser's security settings to validate whether scripting is active or disabled.

**Mobile Applications**

Credit Union ONE's Mobile Applications for accounts ("Applications") allows you to access your account balances and holdings, make deposits, transfers and pay bills on your mobile device. This Policy applies to any Personal Information or Other Information that we may collect through the Applications.

**Linking to other sites**

We may provide links to third party sites, such as credit bureaus, service providers or merchants. If you follow links to sites not affiliated or controlled by Credit Union ONE, you should review their privacy and security policies and other terms and conditions, as they may be different from those of our Sites. Credit Union ONE does not guarantee and is not responsible for the privacy or security of these sites, including the accuracy, completeness, or reliability of their information.

**Social media sites**

Credit Union ONE provides experiences on social media platforms including, but not limited to, Facebook®, Twitter®, YouTube® and LinkedIn® that enable online sharing and collaboration among users who have registered to use them. Any content you post on official Credit Union ONE managed social media pages, such as pictures, information, opinions, or any Personal Information that you make available to other participants on these social platforms, is subject to the Terms of Use and Privacy

Policies of those respective platforms. Please refer to them to better understand your rights and obligations with regard to such content. In addition, please note that when visiting any official Credit Union ONE social media pages, you are also subject to Credit Union ONE's Privacy Notices, Social Media User Terms, and Community Guidelines.

**Security**

To protect Personal Information from unauthorized access and use, we use security measures that comply with applicable federal and state laws. These measures may include device safeguards and secured files and buildings as well as oversight of our third party service providers to ensure information remains confidential and secure.

**Using other aggregation websites**

Other companies offer aggregation websites and services that allow you to consolidate your financial account information from different sources (such as your accounts with us or with other financial institutions) so that you can view all your account information at one online location. To do this, an aggregation provider may request access to Personal Information, such as financial information, usernames and passwords. You should use caution and ensure that the aggregator company has appropriate policies and practices to protect the privacy and security of any information you provide or to which they are gaining access. We are not responsible for the use or disclosure of any Personal Information accessed by any company or person to whom you provide your Site username and password.

If you provide your Site username, password or other information about your accounts with us to an aggregation website, we will consider that you have authorized all transactions or actions initiated by an aggregation website using access information you provide, whether or not you were aware of a specific transaction or action. If you decide to revoke the authority you have given to an aggregation website, we strongly recommend that you change your password for the Site to ensure that the aggregation website cannot continue to access your account.

**Making sure information is accurate**

Keeping your account information accurate and up to date is very important. If your account information is incomplete, inaccurate or not current, please use the Contact Us option on our Site, or call or write to us at the telephone numbers or appropriate address for changes listed on your account statements, records, online or other account materials. You can also speak to a customer representative at a banking center or an account representative.

**Protecting children's privacy online**

The Site is not directed to individuals under the age of thirteen (13), and we request that these individuals do not provide Personal Information through the Site. We do not knowingly collect information from children under 13 without parental consent. Visit the Federal Trade Commission website for more information about the Children's Online Privacy Protection Act (COPPA).

**Protecting individual health information**

To the extent that we receive, maintain, or process an individual's protected health information, Credit Union ONE may disclose that information as authorized by and in accordance with applicable federal and/or state law.

# Updates to this Privacy Policy

This Online Privacy Policy is subject to change. Please review it periodically. If we make changes to the Online Privacy Policy, we will revise the "Last Updated" date at the top of this Policy. Any changes to this Policy will become effective when we post the revised Policy on the Site. Your use of the Site following these changes means that you accept the revised Policy.

# Cookie Guide

The use of cookies and similar technologies is a common internet practice. We have developed this Cookie Guide to provide very general information on cookies and similar technologies (including pixel tags, web beacons, clear GIFs and Flash objects). The Credit Union ONE Online Privacy Policy provides detailed information on how we use cookies.

**What are cookies?**

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are useful in a number of ways, including allowing a website that you use to recognize your device, keep track of pages visited and even remember your preferences. Cookies can expire at the end of a browser session (these are called "session" cookies) or they can be stored longer (these are called "persistent" cookies).

Cookies can be used in the following ways:

**Functionality cookies**
enable you to move around a website and use its features, including accessing secure areas of the website. Without these cookies, services you have asked for cannot be provided. These cookies also allow a website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. For instance, a website may be able to provide you with local weather reports or traffic news by storing in a cookie the region in which you are currently located. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you may have customized. They may also be used to provide services you have asked for such as watching a video or commenting on a blog.

**Performance cookies**
are used to improve how a website works. They collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a particular individual visitor, as the information is aggregated only.

**Targeting or Advertising cookies**
These are used to deliver advertisements that may be relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information may be shared with other organizations such as advertisers.

**What are similar technologies?**

Pixel tags, web beacons and clear GIFs (graphics interchange format) are tiny files used to monitor navigation on a website and may be used with cookies.

Flash objects (local shared objects) are small files stored on your device by a website using Adobe's Flash player technology.

**How can users manage cookies and similar technologies?**

You may be able to control your acceptance of cookies and similar technologies on a website, and most devices and browsers offer their own privacy settings for cookies. You will need to manage your cookie settings for each device and browser you use. If you do not accept cookies, you may experience some inconvenience in your use of some sites and online products. For example, a website may not be able to recognize your device and you may need to answer challenge questions or provide additional information each time you log on. Deleting cookies does not delete Flash objects. You can learn more about Flash objects including how to control and disable them on the Adobe website.

You can find additional information on cookies and similar technologies used on various websites through your browser or other internet resources