Online Privacy Policy

May 2018

As financial service professionals entrusted with sensitive financial information, we recognize the customer's rights to privacy and remain committed to treating customer information responsibly. We believe protecting your information is as important as safeguarding your money. This Online Privacy Policy explains how we collect, share, use, and protect information when you visit or use any of our online services. At Evangelical Christian Credit Union (ECCU), we pledge to serve our customers efficiently and conveniently while maintaining the security they deserve.

If you have a financial product or service with us, we will use and share any information that we collect from or about you in accordance with our <u>Member Privacy Policy Disclosure</u>.

1. Information We Collect

In the course of doing business, we collect and use various types of information, such as information available from public records, credit reports, as well as information you provide to us, including personal information such as your financial status, employment history, marital status, age, email or mailing address, telephone numbers, and other personal information. We also collect information about your accounts, loans, online applications and forms, and other financial transactions and information where we believe it is reasonably required for ordinary business purposes.

2. How We Use Your Information

We may use the information discussed above in various ways, such as:

- Processing applications and transactions;
- Verifying your identity in order to allow you online access to your accounts, to conduct
 online transactions, and to enhance the security of your account and protect your personal
 information:
- Responding to your inquiries;
- Complying with applicable law and regulation, other legal process, and law enforcement requirements;
- Sending you important information about your account(s), products, and services; and
- Performing audits, data analyses, usage trends, and the effectiveness of promotional campaigns in order to evaluate and improve upon our business, products, and services.

3. With Whom ECCU May Share Information

ECCU shares personal information with third parties only as permitted or required by law in connection with the administration, processing, and servicing of account and account-related transactions, in order to perform services for us on your behalf. These services include, but are not limited to, credit reporting agencies, bill payment processors, credit, debit and ATM card processing networks, data processors, check printers, marketing and other companies in order to offer and/or provide financial products and services to you, and in response to legal or regulatory requirements, court orders, and/or other legal processes or investigations.

4. How We Collect and Use Other Information

We may collect and use other information, such as:

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, and language preferences. We use the information for security purposes, to facilitate navigation, to display information more effectively, 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.

<u>IP Address</u>: 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, compliance and security, advertising, and administering the Site. Please see the *Advertising* section below for more information.

5. Advertising

ECCU uses information described in this notice to help advertise our products and services in a variety of ways, such as:

- Present tailored ads to you, including:
 - Banner ads and messages that appear as you sign on or off your online accounts on our Sites or conduct online banking within our Sites;
 - Email and postal mail; and
 - On other sites and mobile apps not affiliated with ECCU; and
- Analyze the effectiveness of our ads; and
- Determine whether you might be interested in new products or services.

6. Protecting Your Information, Confidentiality and 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. Whenever we ask for personal information on our website, we use Secure Socket Layer (SSL Technology) for transferring data. This technology encrypts or scrambles your account information so it's virtually impossible for anyone other than ECCU to read.

Our employees are informed and trained on their responsibility to protect confidential customer information and are bound by this Online Privacy Policy as well as additional internal policies. We limit employee access to confidential customer information to those employees with a business reason to know such information.

7. Accuracy of Information

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" options on our Site: www.eccu.org/contact.

8. Children's Online Privacy Protection Act ("COPPA") Disclosure

The Children's Online Privacy Protection Act of 1998 ("COPPA") restricts the collection, use or disclosure of Personal Information from and about children under the age of 13 on the internet. ECCU does not knowingly solicit data from children, nor do we knowingly market to children. ECCU is, however, committed to complying with COPPA and protecting the online privacy of the children who visit our website and/or use our youth online and mobile services.

We recognize that protecting children's identities and privacy online is important and that the responsibility to do so rests with both the online industry and with parents. We do not knowingly collect personal information from minors without parental consent.

9. When Information is Collected

Some areas of our website require information, such as your email address or your account, to enable you to perform certain tasks (for example, review your accounts or correspond with us). In these cases, we collect your information, if necessary, to interact with you.

10. Social Media Sites

ECCU may provide 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 ECCU-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 ECCU social media pages, you are also subject to ECCU's Privacy Policies and all other applicable guidelines and agreements.

11. Links to Other Sites

We may provide links to other websites. In a few cases, we link to private organizations, with their permission. Once you link to another site, you are subject to the privacy policy of the new site. Please note that since we cannot control information on other Internet sites, we are not responsible for the content on these sites.

12. 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.