

# **3RIVERS FEDERAL CREDIT UNION**

Online Privacy Policy

## **Online Privacy Policy**

This Online Privacy Policy (the "Privacy Policy") describes and applies to the information we collect from you when you visit online interfaces (e.g., website or mobile application) owned or controlled by us (collectively, the "Site"). The terms "3Rivers," "we," "our," and "us" in this Privacy Policy refer to Three Rivers Federal Credit Union and/or its affiliates or subsidiaries. This Privacy Policy describes how we may collect, use, and share information from or about you, and explains how information may be collected and used for advertising purposes. If you are a consumer who has opened an account or obtained a financial product or service from us, or has applied to open an account or obtain a financial product or service from us, this Privacy Policy may apply to you as well. Please also refer to our Privacy Policy and Agreement.

By visiting and/or using the Site, you agree to the terms and conditions of this Privacy Policy and consent to our use of cookies and similar technologies, as described below:

#### 1. Information That We Collect

When you visit and/or use the Site, we receive and collect certain information about you.

#### Information You Choose to Submit

We receive and store any information you enter on the Site, such as information provided through forms, surveys, applications, other online fields, or given to us in any other way. Information you provide may contain personally identifiable information. Personally identifiable information is information that can identify a specific person and includes name, postal and email address, phone number, social security number, and account number. We may combine this online information with information collected from offline sources, the information we already have (including from your other devices), or information that is publicly available. It is possible to browse our Site without submitting any personally identifiable information.

Through our online banking platform and mobile app, you have the option to upload images. For facilitating some transactions, these images might be shared with third-party providers. We will request your consent to use your camera or, access your images before you upload an image for the first time. These images may be used in the following manners:

- Remote Deposit Capture: You may submit an image of an endorsed check (subject to eligibility) to perform an online check deposit. The image facilitates the settlement of the check with the Federal Reserve. The image will be saved and accessible to you and 3Rivers via your transaction history. These images will be stored for at least 7 years.
- Profile Photos and Background Images: To customize your experience, you have the option to upload a
  personalized image. This image can be used for your profile photos. This image will be removed once you
  delete them or, your online banking user account is deleted. Any images uploaded by members are not used,
  accessed, or shared by the credit union for any purpose.

# **Automatically Collected Information**

Every time you visit the Site, some information is automatically collected by us and our third-party service providers, including:

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- From your browser or device Most browsers and devices collect and share certain information, such as Internet Protocol (IP) address, device type, screen resolution, operating system version, internet browser type and version, and geo-location of the device.
- Through cookies Like many websites, we use cookies to enhance your experience on the Site. Cookies are small text files that are placed on your computer or device to distinguish you from other visitors to the Site. We and/or our third-party advertising providers may place cookies or similar files on your hard drive to collect or track information about your activities while using the Site, including time spent on the Site, pages visited, and your relationship with us. Most browsers are typically set to accept cookies. You can choose to have your browser warn you every time a cookie is being sent to you or you can choose not to accept cookies. You can also delete cookies from your device at any time. Most browsers and devices offer their own privacy settings for cookies, and you will need to manage your cookie settings for each device and browser that you use. Please note that if you refuse or delete cookies, the functionality of the Site may be impacted, and/or 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. You may also not receive tailored advertising or other offers from us that may be relevant to your interests and needs. Please note that even if you disable or delete cookies, you will receive the same number of advertisements as before, but those advertisements may not be as relevant to you.
- Through other technologies In addition to using cookies, we and/or our third-party advertising providers may also use similar technologies to track your interactions with our Site. These technologies include web beacons (transparent graphical images placed on a website), pixel tags, and Flash objects. Please refer to your browser's instructions to remove cached Sites, history, and images from your device. If you choose to disable these technologies, the functionality of the Site may become impacted, and you may experience some inconvenience in your use of the Site and some online products and services.
- Analytics Portions of our Site use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help the Site 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 Site, 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. By using this Site, we consent to the processing of data about you by Google in the manner and for the purposes set out above. For more information about how Google Analytics collects and processes data and how to control the information set to Google at "How Google uses information from sites or apps that use our services" at google.com/policies/privacy/partners/.

## 2. How We Use Information

We may use the information collected from and about you in several ways including maintenance and improvement of the Site, consumer service and user experience, advertising, and security.

### **Information You Choose to Submit**

We may use information you choose to provide us through the Site, including personally identifiable information, in a few ways, including but not limited to:

- To personalize your experience on the Site
- To allow you to apply for products or services and to evaluate your eligibility for such products or services
- To respond to your inquiries and fulfill your requests
- To inform you about important information regarding the Site, products, or services for which you have enrolled in, applied for, or may be interested in applying for, as well as changes to terms, conditions, and policies, and/or other administrative information

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- To deliver marketing communications that may be of interest to you, including advertisements or offers tailored to you
- To verify your identity and/or location in order to allow access to your accounts, conduct online transactions, and to prevent fraud and protect the security of your information and the Site
- To allow you to participate in surveys and other forms of market research, sweepstakes, contests, and similar promotions and to administer these activities
- To comply with laws and regulations, and to comply with other legal processes and law enforcement requirements

# **Automatically Collected Information**

We may use information automatically collected, including through cookies and other technologies, in a number of ways, including:

- To recognize your device and to allow you to use online products and services
- To remember your personal settings including preferences and otherwise personalize your experience on the Site
- To facilitate navigation of the Site and ensure technological compatibility with your device
- To display information more effectively and understand how account holders and visitors use the Site
- To improve our products and services
- To provide advertisements and marketing offers and measure the effectiveness of our advertisements and content
- To ensure the Site functions properly
- For fraud detection and prevention and security purposes
- To collect statistical information and conduct aggregate analyses on usage patterns of the Site and response rates
- To help diagnose server problems

# **Online Advertising**

We may use information about your relationship with us, such as types of accounts, transactional information, and your location to help determine which advertisements and offers to present and to make those advertisements and offers more relevant for you.

We and/or our third-party advertising providers may collect certain information about your online activities over time and across different websites when you use our Site, such as pages visited and search terms entered to help determine which of our advertisements or offers may be of interest to you.

Advertisements for 3Rivers may appear on other websites that use the same third-party advertising providers as us. Some of these advertisements may contain cookies that allow for the monitoring of your response to these advertisements. These third-party advertising providers may also use your browsing history across websites to choose which advertisements to display to you.

#### **Sharing of Information**

Please refer to our <u>Privacy Policy and Agreement</u> for our policy on sharing information, including how to opt-out or limit certain information from being shared.

## **SMS Data Sharing**

We do not share any of your personal SMS information with any third parties for marketing or promotional purposes.

# **Digital Banking Profile Deletion Process**

To request the deletion of your Digital Banking Profile, you must do one of the following:

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- Send a message through the Message Center within your Digital Banking Profile
- Fill out a Contact Form at 3riversfcu.org/contact-form
- Call our Contact Center at 800.825.3641
- Send a written request to: 3Rivers Credit Union c/o Digital Experience PO Box 2573 Fort Wayne, IN 46801

# **Data Deletion from the 3Rivers Digital Banking Platform**

When you request the deletion of your Digital Banking Profile, the following data will be deleted:

- Personal Information: All personally identifiable information such as your name, email, address, and phone number
- Transaction History: All records of your financial transactions within the 3Rivers Digital Banking Platform
- App Usage Data: Any data related to your interactions and usage of the 3Rivers Digital Banking Platform

#### 3. E-mail and Electronic Communications

Communications, such as e-mail, text messaging, social media (e.g. Facebook, Twitter, LinkedIn, and YouTube) messaging, and other electronic forms are often insecure. Please do not submit sensitive personal information (such as account number or social security number) via electronic communication. We do not request the sharing of such personal information via these e-mail, text messaging, or social media. Please notify us immediately if such information is being requested by someone purporting to be from 3Rivers.

#### 4. Social Media

You may find information about us or our products and services through our social media pages, such as Facebook, Twitter, LinkedIn, and YouTube. Any information you share on these platforms is visible to all participants on these social media sites and you should never post any sensitive personal information (such as account number or social security number) on these social media sites. These social media sites have different privacy policies from ours, so please be sure to carefully review the policy of each social media site.

### 5. Children's Privacy

The Site is not directed to children under the age of thirteen and we request that all visitors to the Site under the age of thirteen do not provide any personally identifiable information through or on the Site. We do not knowingly collect information from children under the age of thirteen without parental consent.

### 6. Third Party Websites

The Site may contain links to third-party websites or applications and third-party websites or applications may link to the Site. These third-party websites and applications are not part of our Site. Neither 3Rivers nor its affiliates or subsidiaries make any representations or warranties regarding these third-party websites or applications. We are not responsible for any losses or damages in connection with the information, security, privacy practices, availability, content or accuracy of materials of such third-party websites or applications. These third-party websites and applications may have privacy policies different from ours and may provide less privacy and/or security than the Site. We encourage you to review the privacy policy of all third-party websites and applications before you share any personally identifiable information with them.

# 7. Online Security

To protect personally identifiable information from unauthorized access and use, we use commercially reasonable security measures that comply will all applicable federal and state laws. These measures may include device

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safeguards and secured files and buildings as well as oversight of our third-party service providers to ensure information remains confidential and secure.

# 8. Notice to Persons Accessing this Site Outside the United States

If you reside outside of the United States, any information you provide to us on the Site will be transferred out of your country and into the United States. If you do not want personally identifiable information to leave your country, do not provide the information to us. By providing personally identifiable information to us, you explicitly consent to the transfer of your information to the United States.

# 9. Changes to Policy

This Privacy Policy is subject to change. It is your responsibility to review this Privacy Policy and remain informed about any changes to it. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on the Site. Your use of the Site following these changes constitutes acceptance of any amendments to and the most recent of this Privacy Policy.

#### **10. Questions or Comments**

If you have any questions or comments concerning the Privacy Policy, please let us know by contacting us at 1.800.825.3641 or at <a href="mailto:digital@trfcu.org">digital@trfcu.org</a>

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