



## ONLINE PRIVACY POLICY

Last Updated and Effective: January 9, 2023

Your privacy is important to UNIFY Financial Credit Union (“UNIFY”) and our affiliated companies. This Online Privacy Policy (“Policy”) is provided by UNIFY and its wholly owned credit union service organizations, UNIFY Insurance Solutions, LLC, Western Members’ Services, LLC, and UNIFY Members’ Services, LLC, and explains how we collect, share, use, and protect your personal information through your online and offline interactions with us.

This Policy applies to information we collect on this Website. This Policy does not apply to information collected by us offline or through any other means, including any other website operated by us or any third party (including our affiliates and subsidiaries), even if such website is accessible via a link from this Website.

Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this Policy. This Policy may change from time to time. Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check this Policy periodically for updates.

### I. INFORMATION WE COLLECT ABOUT YOU

We collect several types of information from and about users of our Website, including information:

- By which you may be personally identified, such as name, postal address, email address, telephone number, social security, or any other identifier by which you may be contacted online or offline (“**personal information**”);
- That is about you but individually does not identify you; and/or
- About your internet connection, the equipment you use to access our Website, and usage details.

### II. SOURCES OF THE INFORMATION WE COLLECT

We obtain the information listed above from one or more of the following categories of sources:

#### *a. From You or Your Authorized Agent*

We may collect information directly from you or your authorized agent. For example, when you provide us your name and Social Security number to open an account and become a member. We also collect information indirectly from you or your authorized agent. For example, through information we collect from our members in the course of providing services to them.

#### *b. From Our Website and Applications That You Access on Your Mobile Device*

We collect certain information from your activity on our website activity on our website UNIFYfcu.com and your use of applications on your mobile device. We may collect your IP address, device and advertising

identifiers, browser type, operating system, Internet service provider (“ISP”), pages that you visit before and after visiting our website, the date and time of your visit, information about the links you click and pages you view on our website, and other standard server log information. We may also collect your mobile device’s GPS signal, or other information about nearby Wi-Fi access points and cell towers.

#### **i. The Role of Cookies and Other Online Tracking Technologies**

We, or our service providers, and other companies we work with may deploy and use cookies, web beacons, local shared objects and other tracking technologies for various purposes, such as fraud prevention and to promote our products and services to you. Some of these tracking tools may detect characteristics or settings of the specific device you use to access our online services.

“Cookies” are small amounts of data a website can send to a visitor’s web browser. They are often stored on the device you are using to help track your areas of interest. Cookies may also enable us or our service providers and other companies we work with to relate your use of our online services over time to customize your experience. Most web browsers allow you to adjust your browser settings to decline or delete cookies, but doing so may degrade your experience with our online services.

Clear GIFs, pixel tags or web beacons - which are typically one-pixel, transparent images located on a webpage or in an email or other message - or similar technologies may be used on our sites and in some of our digital communications (such as email or other marketing messages). They may also be used when you are served advertisements, or you otherwise interact with advertisements outside of our online services. These are principally used to help recognize users, assess traffic patterns and measure site or campaign engagement.

“First party” cookies are stored by the domain (website) you are visiting directly. They allow the website’s owner to collect analytics data, remember language settings, and perform useful functions that help provide a good experience. “Third-party” cookies are created by domains other than the one you are visiting directly, hence the name third-party. They may be used for cross-site tracking, retargeting and ad-serving. We also believe that cookies fall into the following general categories:

- **Essential Cookies:** These cookies are technically necessary to provide website functionality. They are a website’s basic form of memory, used to store the preferences selected by a user on a given site. As the name implies, they are essential to a website’s functionality and cannot be disabled by users. For example, an essential cookie may be used to prevent users from having to log in each time they visit a new page in the same session.
- **Performance and Function Cookies:** These cookies are used to enhance the performance and functionality of a website, but are not essential to its use. However, without these cookies, certain functions (like videos) may become unavailable.
- **Analytics and Customization Cookies:** Analytics and customization cookies track user activity, so that website owners can better understand how their site is being accessed and used.
- **Advertising Cookies:** Advertising cookies are used to customize a user’s ad experience on a website. Using the data collected from these cookies, websites can prevent the same ad from appearing again and again, remember user ad preferences, and tailor which ads appear based on a user’s online activities.

#### **ii. Online Advertising & Online Behavioral Advertising**

You will see advertisements when you use many of our online services. These advertisements may be for our own products or services (including pre-screened offers of credit) or for products and services offered

by third parties. Which advertisements you see is often determined using the information we or our affiliates, service providers and other companies that we work with have about you, including information about your relationships with us (e.g., types of accounts held, transactional information, location of banking activity). To that end, where permitted by applicable law, we may share with others the information we collect from and about you.

Online behavioral advertising (also known as “OBA” or “interest-based advertising”) refers to the practice of collecting information from a computer or device regarding a visitor’s web-browsing activities across non-affiliated websites over time in order to deliver advertisements that may be of interest to that visitor based on their browsing history. **We do not engage in OBA.**

Our advertising service providers may deliver our advertisements to you on non-affiliated websites. Such service providers control the manner in which the advertisements are delivered to you on such non-affiliated websites. You should generally be able to opt-out of receiving such advertisements from the service provider responsible for delivering the advertisement. Please contact us if you have any difficulty doing so.

***c. Third-party service providers in connection with our services or our business purposes***

We collect information from third-party service providers that interact with us in connection with the services we perform or for our operational purposes. For example, a credit report we obtain from a credit bureau to evaluate a loan application. Another example is a third-party service provider that provides us information to help us detect security incidents and fraudulent activity.

***d. Information we collect from third-parties for a commercial purpose***

We collect information from third-parties for our commercial purposes. We partner with a limited number of third-party analytics and advertising firms. These third parties may use cookies or code processed by your browser to collect public information about your visits to our and other websites in order to provide customized experiences, advertisements or services. These parties may also collect information directly from you by contacting you telephonically, via email or through other communication channels. We do not disclose any information about you to such third-parties except as permitted by applicable laws and regulations, and we require such third-parties to follow applicable laws and regulations when they collect information from you to transfer such information to us.

### **III. HOW WE USE YOUR INFORMATION**

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products or services that you request from us.
- To provide any other purpose for which you provide it.
- To provide you with email alerts, event registrations or other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our website and present its contents to you.
- For testing, research, analysis to improve our products and services and for developing new ones.
- To protect the rights, property or safety of us, our employees, our members or others.
- To prevent, detect and investigate security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.

- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, in which personal information held by us is among the assets transferred.

#### **IV. DISCLOSURE OF YOUR INFORMATION**

We may disclose deidentified or aggregated information about users of this Website without restriction. Deidentified and aggregated information do not include personal identifiers that identify any particular individual.

We may disclose personal information that we collect or you provide as described in this Policy:

1. To our subsidiaries and affiliates.
2. To our contractors, service providers, and other third parties we use to support our business in an effort to bring you improved service across our family of products and services, when permissible under relevant laws and regulations.
3. To other companies, including insurance and financial services companies, to bring you co-branded, jointly marketed, or brokered financial products, services or programs.
4. To third parties that help us advertise, products, services or membership with us to you.
5. To third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.
6. To third parties or affiliates in connection with a corporate transaction, such as a sale, consolidation or merger of our financial institution or affiliated business; and
7. To other third parties to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights, or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third parties.
8. With your consent.

#### **V. DO NOT TRACK (“DNT”) SIGNALS**

Currently, the standards regarding the DNT signals and appropriate responses are not defined. As a result, we do not respond to DNT signals.

#### **VI. CHANGES TO OUR PRIVACY POLICY**

We reserve the right to amend this Policy at our discretion and at any time. When we make changes to this Privacy Policy, we will notify you by email or through a notice on our website homepage.

#### **VII. CHILDREN’S ONLINE INFORMATION PRIVACY**

Our website is not intended for children under the age of 13. We do not knowingly collect, maintain, or use personally identifiable information from our website about children under the age of 13 without parental consent. For more information about the Children’s Online Privacy Protection Act (COPPA), visit the Federal Trade Commission website: [www.ftc.gov](http://www.ftc.gov).

#### **VIII. LINKING TO THIRD-PARTY WEBSITES**

We may provide links to websites that are owned or operated by other companies ("third-party websites"). When you use a link online to visit a third-party website, you will be subject to that website's privacy and security practices, which may differ from ours. You should familiarize yourself with the privacy policy, terms of use and security practices of the linked third-party website before providing any information on that website. We are not responsible for the third-party website's use, collection, sale or sharing of your personal information.

## **IX. SECURITY**

We use reasonable physical, electronic, and procedural safeguards that comply with federal standards to protect and limit access to personal information. This includes device safeguards and secured files and buildings.

Please note that information you send to us electronically may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential information (such as your Social Security number) to us.

## **X. OUR OTHER PRIVACY POLICIES**

If you are a member of UNIFY or a customer of its wholly owned subsidiaries, please visit our federal Privacy Policy for more information about how we collect, use and disclose your personal information and your rights associated with our information sharing practices.

If you are a resident of California, you may have additional rights regarding your personal information under certain California laws, such as the California Financial Information Privacy Act and the California Consumer Privacy Act. Please visit [unifyfcu.com/disclosures](https://unifyfcu.com/disclosures) and review our California-specific policies.

## **XI. CONTACT INFORMATION**

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights, please do not hesitate to contact us at:

Phone: 1-877-871-7304

Website: [UnifyFCU.com](https://UnifyFCU.com)

Email: [CCPA@UnifyFCU.com](mailto:CCPA@UnifyFCU.com)

Mail: Attn: Compliance, UNIFY FCU, 740 North Watters Road, Allen, Texas 75013