

# Pacific Service Credit Union

## Online Privacy Policy

### March 2021

#### Policy Statement

It is the policy of Pacific Service Credit Union (“Pacific Service CU”) to comply with all applicable consumer protection laws, federal and state laws, as well as the Department of Financial Protection and Innovation (DFPI) and other governing bodies’ rules and regulations as they apply to online privacy. This Online Privacy Policy (“Policy”) addresses how we collect, use, share and protect information from our website and other online and mobile practices.

#### Introduction

Pacific Service CU understands the importance of protecting your privacy. Our goal is to maintain your trust and confidence when handling your personal information. We are committed to maintaining the confidentiality of your personal information consistent with federal and state laws. This Policy describes how Pacific Service CU collects, uses, shares, and protects information when you visit or use [www.pacificservice.org](http://www.pacificservice.org) (“the Website”), online applications or online and mobile banking (collectively “Services”). By using the Website or Services, you consent to the terms and conditions of this Policy, including your consent to our use and disclosure of information about you in the manner described in this Policy. The term “us,” “we” or “our” in this Policy refers to Pacific Service CU.

#### How We Collect and Use Your Information

You may interact with us in a variety of ways online, including through your personal computer, mobile device, or other internet-enabled device. We offer sites and services that permit browsing and do not require registration. We also offer the ability to access your accounts online or through a mobile device, which requires you to register and securely login. Information we may collect about you through these interactions include information you input, such as your name, address, email address, other contact information; data resulting from your activity, such as transaction information; and location information. We may also gather additional information, such as the type of device and browser you are using, the internet protocol (IP) address of your device, information about your device’s operating system, and additional information associated with your device. We may also gather information collected through cookies and other technologies, as described further below. This information allows us to serve you better.

#### Cookies

Cookies are pieces of information stored directly on your personal computer, mobile device, or other internet-enabled device. Browser cookies are assigned by a web server to the browser on your device. When you return to a website you have visited before, your browser gives this data back to the server. We use cookies and information gathered through their use to make your experience with us more personalized based on the products, services, or other interactions you have with us. Information gathered through the use of cookies may be used to make offers to you through online ads, email, U.S. mail or telephone, subject to our Privacy Policy. Cookies we use do not contain or capture unencrypted personal information.

We may collect certain non-personally identifiable information about you and your personal computer or mobile device when you access the Website or Services and/or visit certain Website or Services pages. This non-personally identifiable information includes, without limitation, the following information pertaining to your mobile device and your use of the Website or Services: (a) mobile device platform type; (b) mobile device identifier; (c) SDK version; (d) App version; (e) Media Access Control (MAC) address; (f) International Mobile Equipment Identity (IMEI); (g) the model type, manufacture and iOS version of the mobile device; (h) your Website or Service session start/stop time and date; and (i) the actions taken while utilizing the

Website or Services. We use the non-personally identifiable information identified in this paragraph to improve the design and content of the Website or Services and to enable us to personalize your Website or Services experience. We also may use this information in the aggregate to analyze Website or Services usage, alter existing Website or Services and/or develop new or different Website or Services.

We may use geolocation tracking technology ("Location Services") in order to enable certain features of our Website and Services, such as providing you with information regarding your proximity to the nearest credit union branch, security functionality, and fraud protection. In connection with the foregoing, your geolocation information will not be shared with third-parties for marketing purposes. Other than as set forth in this paragraph, we do not track your geolocation, or share or use your geolocation information, for any purpose.

### **Cross Device Tracking**

We may track end-users' use of the Website or Services across various devices, including your personal computer or mobile device, in order to optimize and personalize your Website or Services experience. We also may collect certain of your personal information across various devices.

### **Behavioral Tracking and Advertising**

In addition, we may also use other tracking technologies such as Google Analytics, pixel tags, clear graphics interchange format (GIFs) and web beacons for the purpose of measuring the effectiveness of our advertising or other communications, to determine viewer response rates and to determine which offers to present on third-party websites.

### **Aggregate Data**

We reserve the right to aggregate or group data about end-users of the Website and Services for lawful purposes. Aggregate or group data is data that describes the demographics, usage and other characteristics of the Website and Services users as a group, without disclosing personally identifiable information.

### **Cookie Settings and Do Not Track Signals**

The browsers of most personal computers, mobile devices, and other internet-enabled devices are set up to accept cookies. You can refuse to accept these cookies through your browser settings. You will need to manage your cookie settings for each device and browser you use. If you choose to reject cookies, you may not be able to use the full functionality of the Website and Services. For example, you will not be able to access our online and mobile banking service and those services within online banking, if all cookies are blocked.

Do Not Track (DNT) refers to a Hypertext Transfer Protocol (HTTP) header used by internet web browsers to request a web application to disable its tracking or cross-site user tracking. California law requires us to disclose how we respond to web browser DNT signals. When DNT is enabled, a user's web browser adds a header to content requests indicating that the user does not want to be tracked. Currently, the standards regarding DNT signals and appropriate responses are not defined. As a result, we do not respond to DNT signals.

### **Personal Information We Collect**

When you interact with us via our Website or Services, we will not obtain personal information about you unless you choose to provide such information. Personal information that we may collect about you through online interaction includes information that you provide, such as your name, mailing address, email address and other contact information; data resulting from your activity, such as transaction information; and limited location information (for example, a ZIP code to help you find a nearby ATM). We may also collect payment card information, social security numbers, and driver's license numbers when you provide such information while using our Website or Services.

We will retain your personal information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal and regulatory obligations, resolve disputes, and enforce our agreements.

### **Other Information We Collect**

In addition to the personal information described above, we may also collect anonymous demographic information, which is not unique to you, such as your ZIP code, region, preferences, interests, and favorites. We may also automatically collect information about your computer hardware, such as the internet protocol (IP) address of the device you use to connect to the Website or Services, the type of operating system and browser you use, search engine used, access times, referring website addresses, the parts of our Website you access, and the site you visit next.

### **Third-Party Widgets**

We may allow certain widgets (e.g., social share buttons) on our Website that allow users to easily share information on another platform, such as a social media platform. The third-parties that own these widgets may have access to information about your browsing on pages of our Website where these widgets are placed. You may wish to review information at the third-party sites, such as social media platforms where you have an account, to determine how these third-parties collect and use such information.

### **How We Use Information**

In addition to the uses described above, we use the information for purposes as allowed by law, including, but not limited to:

- Process applications and transactions;
- Service your accounts with us;
- Send you important information regarding the Website or Services, changes to terms, conditions and/or policies;
- Track Website usage, such as number of hits, pages visited, and the length of user sessions in order to evaluate the usefulness of our Website;
- Verify your identity (such as when you access your account information);
- Respond to your requests and to communicate with you;
- Send you marketing communications that we believe may be of interest to you;
- Allow you to participate in surveys, sweepstakes, contests and similar promotions;
- Our business purposes, including data analysis, developing and improving our products and services, and enhancing our Website or Services;
- Prevent fraud and enhance the security of our Website or Services.

### **How We Share Your Information with Third-Parties**

If you are a Pacific Service CU member, we will use and share any information that we collect from or about you in accordance with our Privacy Policy. We may share the information we collect from and about you with service providers with whom we work, such as data processors. When permitted or required by law, we may share information with additional third-parties for purposes including responding to legal process. Where appropriate, we will limit sharing of your information in accordance with our Privacy Policy.

Third-parties may collect information about your web browsing behavior when you use our Website or other third-party websites. Limiting or restricting collection of this information is dependent on your browser settings and third-party privacy practices, which are outside of our control. We may contract with third-party marketing service providers that use technology such as cookies to advertise our products and services on third-party websites. However, we do not allow third-parties to collect personally identifiable information from our Website. We do not sell or lease our member or visitor information to third-parties.

## **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).

## **Updating Member Information**

It is important to keep your account information up to date. Our members can access and/or update their personal information by logging into online or mobile banking or by calling a member service representative at (888) 858-6878.

## **Security**

To protect your personal information from unauthorized access and use, we use security measures that comply with applicable federal and state laws. These measures may include a combination of technical, operational and managerial controls. Security mechanisms in place include, but are not limited to physical security of our building and data center, firewalls, data loss protection systems, network monitoring and encryption to protect certain sensitive transmissions of information. In addition, we have agreements with our third-party service providers to secure and protect sensitive information. We will never contact you via phone, email or text message requesting account or personal information. Members should protect the confidentiality of information such as an account number, social security number, email address and password. Furthermore, members should be aware of "phishing" attempts to steal personal information. Never provide your personal information including login or password information through an unsolicited phone call, email or text message even from companies that you do business with.

## **Linking to Other Websites**

Our Website Site contains links to third-party websites. Although these links were established to provide you with access to useful information, Pacific Service CU does not control and is not responsible for any of these websites or their content. We do not know or control what information third-party websites may collect regarding your personal information. Pacific Service CU provides these links to you only as a convenience, and Pacific Service CU does not endorse or make any representations about using such third-party websites or any information, software or other products or materials found there, or any results that may be obtained from using them. We encourage you to review the privacy statements of websites you choose to access through the Pacific Service CU Website so that you can understand how those websites collect, use, and share your information. Pacific Service CU is not responsible for the security or privacy practices of the linked websites.

## **Opt-Out/Unsubscribe**

To opt-out of receiving e-mail and other forms of communication from us, you can call a member service representative at (888) 858-6878 or follow the instructions included in the Privacy Policy or other communication. If you wish to opt-out of receiving e-mail and other forms of communication from a third-party, whether an Affiliate or Marketing partner, please consult that third-party's opt-out policies or contact that third-party directly.

## **Updates to this Online Privacy Policy**

From time to time, we may change this Policy. The effective date of this policy, as indicated below, reflects the last time this Policy was revised. Any changes to this Policy will become effective when we post the revised Policy on our Site. Your use of the Site or Services following these changes means that you accept the revised Policy.

Last update: 03/2021