

ONLINE PRIVACY POLICY



EFFECTIVE SEPTEMBER 1, 2018

Advancial Federal Credit Union (“Advancial”, “we”, “our”, “us”) recognizes the importance of protecting the privacy of Personal Information about our members and others who visit our website or branded social media sites and who use our online services. This Online Privacy Policy covers Advancial’s website, branded social media sites and pages, Advancial branded digital advertising campaigns (collectively “Sites”) and our online services including cuAnywhere, Advancial’s mobile banking services, and any other existing or future Advancial branded online services (collectively “Online Services”).

Please note that if you have any financial products or services with us, our Consumer Privacy Policy (<https://www.advancial.org/Files/PDFs/PrivacyNoticeOnly-09-19-13.aspx>), continues to apply to our use and sharing of Personal Information that we collect from or about you when you use our financial products and services.

Personal Information We Collect When You Use Our Online Services

- Personal Information from or about you when you apply for membership online, register to use our Online Services, open accounts online, use mobile banking services, and when you use any of our Online Services. Such Personal Information includes personal identifying information such as your name, member number, account numbers, home or other physical address, mailing address, Social Security Number, telephone number, email address, limited location information (for example a zip code to help you find an ATM), payment card information, driver’s license numbers (or something comparable), user name, password, and secret questions and secret answers for resetting passwords.
- Personal Information (as identified above) that you give us in e-mails or other online communications you send to us. However, we use your e-mail address only for the purpose of responding to your comments or questions. We do support an optional Listserv, “Advancial Federal Electronic Mailing List”, which provides members and potential members with information about products and services. You always have the ability to unsubscribe. To unsubscribe, you may contact us by e-mail, phone, fax or mail. Your e-mail address provided in order to join the list will not be sold, nor will it be shared with others outside the credit union, unless we are required to do so by law.

We do not collect Personal Information from you when you simply visit or browse our Sites. We do, however, collect non-Personal Information from you when you visit or browse our Sites. (See the policy concerning “Non-Personal Information” below).

This is How We Will Use Your Personal Information

We will only use your Personal Information as permitted by law and including for these purposes:

- To complete transactions and provide services authorized by you
- If you complete an application online, we use the Personal Information you provide to complete the request or transaction.
- To confirm and authorize transaction limits
- To provide you access to your accounts
- To authenticate you when you log in
- To verify your identity
- To send you information about your accounts
- To respond to inquiries and complete requests
- To provide account alerts
- To provide information to you about our products and services
- To provide information regarding our digital properties, upcoming changes, etc.
- To personalize your experience by tailoring products and offers to you
- To send you surveys, sweepstakes, contests and similar promotions
- To manage your preferences

Other reasons we may use your Personal Information include, but are not limited to, to prevent fraud and unauthorized transactions, to perform collections, to comply with laws and regulations, to protect the personal safety of subscribers or the public, to prevent and defend claims, to resolve disputes, to enforce our terms of use for our Online Services, to protect our rights and property.

Your Personal Information is only accessed by Advancial staff who are responsible for completing your request and/or transaction. Subsequent Advancial staff access to your personal information is done to complete another request or transaction that you authorized. You may request to change your Personal Information by sending a signed request through the U.S. mail or faxing a signed written request.

We store no Personal Information on our web server that is accessed by the public. All account information is housed on secure servers.

How We May Share Personal Information With Third Parties

We may share Personal Information with our business partners in order to deliver products and services which you have requested (for example, obtaining a credit bureau report if you applied for a loan). Information may, from time to time, be made available on a limited basis to our business partners, to provide special

ONLINE PRIVACY POLICY



EFFECTIVE SEPTEMBER 1, 2018

offers or promotions of products or services that may be of interest to particular members, or in accordance with applicable law. Our business partners are carefully selected and share the same strict business principles as Advancial Federal Credit Union. We do not sell your Personal Information.

Non-Personal Information We Collect When You Visit or Browse Our Sites or Use Our Online Services

When you are browsing our Site or interacting with our other digital platforms, our servers collect non-Personal Information from and about you using common industry methods, which include:

- Cookies - we assign "cookies" to your Internet browser. A "cookie" is an electronic marker stored on your local hard drive through the browser and contains a unique sequence of text for identification purposes. Cookies will indicate activity or access to a specific website or pages contained on a website. When you return to our website, your browser will give that information back to our server. We use cookies to maintain the state of your session on our website and to store your computer's configuration data. This cookie data is tied to your personally identifiable information to enable our Online Services but the cookie data is not shared with third parties. If you disable cookies on the computer you are using, you may not be able to fully use our Online Services as certain functionality may not be available. It is recommended that you turn off any options warning you before accepting cookies. The cookies taken will not be sold, nor will any related information be shared with others outside Advancial, unless we are compelled to do so by law. We do not encode your personally identifiable information in our cookies. Some of our business affiliates use cookies on their sites. We have no access to or control over these cookies.
- Demographic information such as your location
- Browser and mobile device information - we collect certain information from browsers and mobile devices, such as, your IP address, device type, operating system version, Internet browser type and version, pages you visit, information you request, and the date and time of your access
- JavaScript tags, pixel tags, web beacons or other technologies - we use these technologies to collect high-level, anonymous, aggregate data
- Mixpanel - we use Mixpanel, which uses cookies and other similar technologies to collect information you provide to us. You can prevent Mixpanel from recognizing you by disabling cookies on your browser.
- Web tracking software - we use web tracking software to collect information about the name of the domain from which you access the Internet (example: flash.net, or att.net) and the site from which you came. We use this information for internal analysis only, which helps us improve the content of our Site for your future visits.

This is How We Will Use Your Non-Personal Information

- To enable features on the digital platforms
- To ensure the digital platforms are operating properly and to assist in preventing non-authorized users from accessing your information
- To continuously drive user experience and content improvements
- To analyze the success of our marketing and communication efforts
- To diagnose problems with the website or application
- To troubleshoot problems
- To analyze our products and services
- To customize, measure, and improve our Online Services

We may also use data that we collect on an aggregate or anonymous basis (such that it does not identify any individual customers) for various business purposes, where permissible under applicable laws and regulations.

How We May Share Non-Personal Information With Third Parties

We may share your non-Personal Information with affiliates in accordance with the practices set forth in our Consumer Privacy Policy (<https://www.advancial.org/Files/PDFs/PrivacyNoticeOnly-09-19-13.aspx>). We may also shared your non-Personal Information with non-affiliated third parties to enhance your experience on our Sites, to help deliver our ads on your web browser, and to measure advertising campaign effectiveness.

E-mail security

If you receive an e-mail from us, (a) your e-mail address is either listed with us as someone who has expressly shared this address for the purpose of receiving information in the future ("opt-in"), (b) you have registered or otherwise have an existing relationship with us, or are using our services. We respect your time and attention by controlling the frequency of our e-mails.

Each e-mail sent contains an easy, automated way for you to cease receiving e-mails from us, or to change your expressed interests. If you wish to do this, simply follow the instructions at the end of any e-mail.

ONLINE PRIVACY POLICY



EFFECTIVE SEPTEMBER 1, 2018

If you have received unwanted, unsolicited e-mails via our digital platforms, or purporting to be sent via our digital platforms, please forward a copy of that e-mail with your comments or concerns to msc@advancial.org and we will take the appropriate action requested by you.

Security Procedures and Other Measures We Take to Protect Personal Information

All cuAnywhere sessions are authenticated and encrypted. The authentication of a cuAnywhere session is handled through your Profile ID/UserName and Password combination, which is required at login. You have the ability to update your ProfileID/UserName and/or Password in the Manage section within cuAnywhere. The encryption is accomplished by establishing a Secure Socket Layer (SSL) connection between the browser and the Web server. You can only access cuAnywhere with an SSL compliant browser.

We take appropriate measures to ensure that your Personal Information is not compromised. Access to Personal Information is restricted to employees and the above-referenced third parties on a need-to-know basis who have a specific business purpose to access your data. Our employees who are granted access to your information are bound by strict confidentiality obligations and may be subject to discipline for breaching these obligations. Third parties are bound by a confidentiality provision in their agreements with us, which prevents these third parties from making your information available for any reason other than that which was intended. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your personal information. We will continue to test and update our technology to make improvements as necessary in protecting your personal information.

We do not respond to web browser "do not track" signals because we do not allow third parties to collect personally identifiable information of visitors to our web site to track their online activities.

Advertising

We have certain areas on our Sites that are co-branded with a third party or are a private label area that is not owned or operated by Advancial. When you provide information to these third parties at the co-branded or their private label areas that information is not accessible by Advancial and is only accessible by the third party. Advancial has, wherever possible, structured its partnerships with entities that share the same privacy values as us. Some of the partnerships developed have these terms expressed in our Agreement with the third party. If you believe that your privacy has been violated on a partner site, then you should contact us immediately.

Advancial advertises on our website, as well as, on other websites not affiliated with Advancial. If you access Advancial's website from a third party website, such as search or a social media platform, we will track the referring website for internal purposes and to measure the success of our marketing efforts. Information collected by our advertising service providers through cookies and other technologies includes search engine referrals, browsing patterns and responses to advertisements and promotions.

We take your online privacy seriously and make the safeguarding of your Personal Information a priority. We collect Personal Information only as allowed by law. Use of the internet makes it possible for other parties to collect data about your online activities over time and across different websites, including when you use our Sites.

Former Customers:

If you are no longer using our Online Services, we continue to protect, use, and share your Personal Information pursuant to this Online Privacy Policy and as required by law, including but not limited to: for risk management, regulatory compliance, and audit purposes.

What You Should Do If You Believe Your Privacy Has Been Compromised on our Sites or as a Result of Using Our Online Services

You should contact the Advancial's Fraud Dept. at fraudalert@advancial.org immediately and identify your problem. If this does not result in proper resolution, Advancial does participate in the Better Business Bureau (BBB) and adheres to its Customer Complaint Resolution process. You can access this process directly at the BBB online site.

Online Privacy Policy Changes

We are always improving our Sites and Online Services. As our Sites and Online Services evolve, we may update or amend this privacy policy. If we modify this policy, we will post the revised privacy policy online. The revised policy will be effective immediately at the time of posting, unless a later effective date is expressly stated therein. We will also revise the "last updated date" stated above.

Should any modification materially change how we use your Personal Information or non-Personal Information, we will provide notice online prior to the effective date of the change.

It is your responsibility to periodically review this privacy policy. You are bound by any changes to this privacy policy by visiting or browsing our Sites or using our Services after such changes have been first posted."