

# Together Credit Union Online Privacy Notice

Last updated: 01/04/2021

Together Credit Union values the privacy of our members and visitors. We take our responsibility seriously to protect your identity, as well as any information we may collect as you interact with us online.

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## Our Online Privacy Notice:

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- covers your interaction with Together Credit Union (“we”, “our,” and “us) and partners engaged by Together Credit Union to provide online services when you visit any mobile or online Site or application that we own and operate, including, but not limited to, our website (togethercu.org) and our mobile app (collectively, “Sites”);
- does not cover your interaction with websites or mobile applications that we do not own and operate, including, but not limited to, those of third parties and partner companies linked to from our Sites, which are governed under their own Privacy Policies;
- describes types of personally identifiable information (“Personal Information”) that we may collect about you when you interact with or visit our Sites;
- describes categories of other persons or entities with whom we may share your Personal Information;
- discloses whether other parties may collect Personal Information about your online activities over time and across different websites when you use our Sites;
- describes the way you can review and request changes to any of your Personal Information that we collect;
- describes how we will inform you of important changes to our Privacy Policy;
- discloses how we respond to web browser “do not track” signals or other opt-out mechanisms;
- discloses if we engage in the collection of your Personal Information about your online activities over time and across different websites;
- describes how we protect children’s privacy; and
- makes clear that no action on your part is needed/

## 2. What Information Do We Collect?

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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.

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We may collect Personal Information when you enter data into forms, surveys, or applications for new products or services, or when you use our products and services.

Personal Information may include your name, Member Number, home or other postal address, Social Security Number or other government-issued ID number, telephone number, and email address. Additionally, our Sites may collect certain electronic data, such as your geolocation, IP address, or device identifier.

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## 3. How Do We Use Personal Information?

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We may use personal information:

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- to respond to your inquiries and fulfill your requests;
- to inform you about important information regarding the Site, products or services for which you apply or may be interested in applying for, or in which you are already enrolled, changes to terms, conditions, and policies and/or other administrative information;
- to deliver marketing communications that we believe may be of interest to you, including, ads or offers tailored to you;
- to personalize your experience on the Site;
- to allow you to apply for products or services (e.g., to apply for membership, prequalify for a mortgage, apply for a credit card, or to open a deposit account or other financial product) and evaluate your eligibility for such products or services;
- to verify your identity and/or location (or the identity or location of your representative or agent) in order to allow access to your accounts, conduct online transactions and to maintain measures aimed at preventing fraud and protecting the security of account and Personal Information;
- to allow you to participate in satisfaction surveys and other forms of market research, sweepstakes, contests and similar promotions, and to administer these

activities. Some of these activities have additional rules, which may contain additional information about how Personal Information is used and shared;

- to allow you to use some Site financial planning tools. Information that you enter into one of these planning tools may be stored for future access and use. You have the option to delete the information;
- collected through our social media pages and other online interactions with you to assist in verifying your identity and account status. We may combine this online information with information collected from offline sources or information we already have;
- for business purposes, including data analysis, audits, developing and improving products and services, enhancing the Site, identifying usage trends and determining the effectiveness of promotional campaigns;
- for risk control, for fraud detection and prevention, to comply with laws and regulations, and to comply with other legal process and law enforcement requirements;
- to allow you to utilize features within our Sites by granting us access to information from your device such as geo-location when you request certain services.

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## 4. How Do We Collect and Use Other Information?

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Other Information is any information other than Personal Information that does not reveal your specific identity or does not directly relate to an individual, such as browser information, information collected through cookies, pixel tags and other technologies, demographic information, and aggregated and de-identified data.

We and our third-party service providers may collect and use Other Information in a variety of ways, including:

**Through your browser or device:** certain information is collected by most browsers and/or through your device, such as your Media Access Control (MAC) address, device type, screen resolution, operating system version, and internet browser type and version. We use this information to ensure Sites function properly, for fraud detection and prevention, and security purposes.

**Using 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, Site preferences, and your relationship with us. We use the information for security purposes, to display information more effectively, to personalize your

experience with the Sites, 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 members and visitors use the Site, and to assist us with resolving questions regarding the Site. We also use 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. For example, we will not be able to recognize your device and you may need to answer a security 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.

**Other technologies including pixel tags, web beacons and clear GIFs:** These may be used in connection with some Site pages, mobile app features and HTML-formatted email messages to measure the effectiveness of our communications, the success of our marketing campaigns, to compile statistics about usage and response rates, to personalize/tailor your experience with us, for fraud detection and prevention, for security purposes, and for advertising. Please see our Advertising section below for more information regarding our use of other technologies.

**IP Address:** 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, to personalize/tailor your experience while engaging with us online and offline, for compliance and security purposes, for advertising, and administering the Site. Please see the Advertising section below for more information.

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## 5. With Whom Do We Share the Information We Collect?

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We may share your Personal Information with affiliates and third parties in accordance with the practices set forth in our [Member Privacy Policy](#). We do not and will not sell your Personal Information. We may use or share information to enhance your experience on our sites, to help deliver our ads on your web browser, and to measure advertising campaign effectiveness. We may also share your information as required to meet legal and regulatory obligations.

**Advertising:**

Together Credit Union advertises online (e.g., pages within our Sites and mobile app,

through our social media presences, and on other sites and mobile apps not affiliated with us) and offline (e.g. in branches, through our Member Contact Center, and direct marketing). In order to understand how advertising performs, we may collect certain information on our Sites and other sites and mobile apps through our advertising service providers using cookies, IP addresses, and other technologies. The collected information may include the number of page visits, pages viewed on our Sites, search engine referrals, browsing activities over time and across other sites following your visit to one of our Sites or apps, and responses to advertisements and promotions on the Sites and on sites and apps where we advertise.

Together Credit Union uses information described in this Notice to help advertise our products and services, including prescreened offers of credit, in a variety of ways. We use such information to:

- Present tailored ads to you including:

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  - Banner ads and splash ads that appear as you sign on or off of your online accounts on our Sites,
  - E-mail and postal mail and,
  - On other sites and mobile apps not affiliated with Together Credit Union;

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- Analyze the effectiveness of our ads; and
- Determine whether you might be interested in new products or services

#### **How we tailor ads:**

##### **Relationship based advertising**

In order to help make our advertising informative and useful, we may use information about your relationship with us (such as types of accounts, transactional information or preferred branches) to help determine which advertisements or offers to present to you.

##### **Online Behavioral Advertising**

We or our advertising service providers may use certain information about your activities on our Sites, such as pages visited and search key words entered, to help determine which of our advertisements or offers may be of interest to you. We limit access and collection of information for specific purposes by advertising service providers. We may use this online information for online and offline advertising.

##### **Advertising on third party sites and mobile apps**

Together Credit Union contracts with advertising companies to advertise our products and services on sites and mobile apps not affiliated with us. We may use information provided by you to these third party sites and mobile apps to select which of our advertisements or offers may appeal to you, display them to you and monitor your responses. Third Party sites and mobile apps are not subject to the Together Credit Union Privacy Notice. Please visit the individual sites and mobile apps for additional information on their data and privacy practices and opt-out policies.

### **Online Behavioral Advertising on third party sites and mobile apps**

Some of our tailored ads are online behavioral advertising, and may be served using data collected by third party providers. Ads served on our behalf by these companies do not contain unencrypted Personal Information and we limit the use of information by companies that serve our ads. To learn more about this practice and your choices in connection with it, see the section Advertising Choices below.

### **Advertising Choices**

You may set your choices for advertising in the following ways:

#### **Direct Marketing:**

If you prefer we not deliver you marketing offers in email, postal mail or through telemarketing you may opt out by calling us at 1-800-325-9905, or visiting your local branch.

#### **Advertising on third party sites:**

Together Credit Union participates in the Digital Advertising Alliance (DAA) self-regulatory program, uses the Advertising Options Icon on our behavioral ads on third party sites (excluding ads appearing on platforms that do not accept the icon) and adheres to the DAA self-regulatory Principles for Online Behavioral Advertising. Anyone receiving a behavioral ad may click on the displayed icon to receive more information and can opt out at that time or by visiting the third party site's privacy policy for an opt-out mechanism.

You may also opt out of receiving behavioral ads from many sites through the Network Advertising Initiative's Opt-Out Tool or other tools provided by the publishing platform. Please note that if you opt out, you may still receive untailored online advertising from Together Credit Union. Opting out from a specific third party site means that the ads you receive will not be tailored based on your choices or behavior.

#### **Linking to other sites**

We may provide links to third party sites, such as service provider partners and consumer information resources. If you follow links to sites not controlled by Together Credit Union, you should review their privacy and security policies and other terms and conditions, as they may be different from those of our Sites. Together Credit Union does not guarantee and is not responsible for the privacy or security of these sites, including the accuracy, completeness, or reliability of their information.

#### **Social media sites**

Together Credit Union provides experiences on social media platforms including, but not limited to, Facebook®, Instagram®, Twitter®, YouTube®, and LinkedIn® that enable online sharing and collaboration among users who have registered to use them. Any content you post on official Together Credit Union 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.

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## 6. Keeping Your Information Accurate

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It is important that we have accurate and up-to-date information about our members. If you notice that your information is incomplete, inaccurate, or out of date, please contact us at 1-800-325-9905 or visit a branch. You can also review and update certain Personal Information such as your email address, mailing address, and telephone number by securely logging into your account through our Sites.

## 7. Policy Updates

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We may change our policy from time to time. When we do, we will let you know by appropriate means, such as by posting the revised policy on this page with a new “Last Updated” date. Any changes to our policy will become effective when posted unless indicated otherwise.

## 8. How You Can Control Your Information

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Our Sites are designed for optimal viewing with cookies enabled (cookies are small text files that collect internet traffic data). For example, cookies store your preferences for when you visit our Sites. If your web browser settings allow cookies, our Sites will utilize them. You may disable or remove cookies by accessing your web browser settings. Our Sites will still function without cookies, but some features may not work properly. Please note that due to a lack of consistent standards across browsers, our Sites may not respond to “do not track” browser settings. We do not monitor your online activities after you leave our Sites.

We only use your Personal Information for certain purposes allowed by law (see Section 3 and refer to our [Member Privacy Policy](#)), which you cannot limit.

You may, however, be able to opt out of certain advertisements. To learn more about a particular advertising network (including how to opt out), click on the industry group network symbol or link located on the advertisement.

## 9. Children’s Privacy

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We do not knowingly collect Personal Information from individuals under the age of 13 who use our Sites without obtaining consent from a parent or legal guardian.

To learn more about the Children's Online Privacy Protection Act (COPPA), please visit the [Federal Trade Commission's website](#).

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## 10. Data Sharing

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Although Together does not share your Personal Information with nonaffiliated third-party companies except as provided by our [Member Privacy Policy](#), we are aware that you may choose to do so in order to use their services. For example, you may have authorized some third-party companies to access your Personal Information and account data to offer financial information and services such as: account aggregation (consolidating your financial account information from different sources), making payments via a website or mobile application, and tax preparation. Because these third-party companies have access to your Personal Information and account data and may use your account sign in credentials in order to provide the service, we recommend you use caution when granting such access to third-party companies.

Some of these third-party companies may use other companies to assist them with providing services or with accessing your Personal Information or account data. Any one or all of these companies may be storing your Personal Information or account data. Together Credit Union is not responsible for the use or disclosure of any Personal Information or account data accessed by or on behalf of any company or person to whom you provide your Together Credit Union sign in credentials or account information. We do not control the privacy, security, or accuracy of your information that may be held by these third-party companies, which are governed by the third-party's privacy policy and data security program. We are also not responsible for any fees associated with these third-party services.

When you provide your sign in credentials to your Together Credit Union accounts to a third party, you will be deemed by us to have authorized all transactions or actions initiated by that third party using the access information you provided, whether or not you are aware of the specific transaction or action.

If you decide to revoke the access authority you previously gave to a third party, we strongly recommend that you change your Together Credit Union password to ensure that the party cannot continue to access your account. For security and other reasons, Together Credit Union reserves the right to block or disable third-party access to any account without notice.

Additional information on our digital banking terms and conditions can be found in our [Online, Mobile and E-Sign Consent Agreement](#).

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## **11. Do You Need to Take Any Action at This Time?**

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No, you do not need to take any action regarding any of the above.

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