

PARTNERS FEDERAL CREDIT UNION ONLINE PRIVACY POLICY

Last updated July 3, 2018

Partners Federal Credit Union (“Partners”) 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 state and federal laws. This Online Privacy Policy (“Policy”) describes how Partners collects, uses, shares, and protects information when you visit or use www.partnersfcu.org (“the Website”). By using the Website, 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 Partners Federal Credit Union.

Collecting, Using and Sharing Information

You may interact with us in a variety of ways online, including through a mobile device. We offer sites and applications 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. We may obtain personal information through these various interactions with you.

How We Collect Information

Understanding Cookies, Web Beacons and Other Tracking Technologies

The use of cookies and other similar tracking technologies is a common practice for companies that provide services online. When you visit the Website, we, or our service providers, and other companies we work with may deploy and use cookies, web beacons, local shared objects and other similar tracking technologies for various purposes, such as fraud prevention and monitoring our advertising and marketing campaign performance. Some of these tracking tools may detect characteristics or settings of the specific device you use to access our Website. These tracking technologies and their uses are further described below.

“Cookies” are pieces of information that are stored directly on your computer, smartphone or other internet access 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. When you visit the Website, we may use cookies and information gathered through their use to personalize your experience with us based on the products, services and other interactions you have with us. Information gathered through the use of cookies may be used to make offers to you via online ads, email, U.S. mail or telephone, subject to the privacy preferences you have on file with Partners. Cookies we use do not contain or capture unencrypted personal information.

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.

Local Shared Objects, sometimes referred to as “flash cookies” may be stored on your hard drive using a media player or other software installed on your device.

The browsers of most devices are set up to accept cookies and other tracking technologies. You may be able to refuse to accept cookies, web beacons, and other tracking technologies through your browser settings. Local Shared Objects are similar to cookies in terms of their operation, but may not be managed in your browser in the same way. For more information on managing Local Shared Objects, [click here](https://helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html) <https://helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html>. You will need to manage your 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. For example, if we are not able to recognize your device, you will need to answer a challenge question each time you log on. You also may not receive customized advertising or other offers from us that may be relevant to your interests and needs.

How We Respond To “Do Not Track” Signals

“Do Not Track” (“DNT”) refers to an HTTP header used by Internet web browsers to request a web application disable its tracking or cross-site user tracking. 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. California law requires us to disclose how we respond to web browser DNT signals. We do not respond to or take any action with respect to a DNT configuration set in your internet browser, and therefore, do not disable tracking.

Personal Information We Collect

When you interact with us via our Website, 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.

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 obligations, resolve disputes, and enforce our agreements.

Other Information We Collect

In addition to the personal information described above, we 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

IP address of the device you use to connect to the Website, 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, such as:

- To process applications and transactions;
- To service your accounts with us;
- To take collection action or repossess personal property collateral if you are in default on your loan obligations to us;
- To send you important information regarding the Website, changes to terms, conditions and/or policies;
- To 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;
- To verify your identity (such as when you access your account information);
- To respond to your requests and to communicate with you;
- To send you marketing communications that we believe may be of interest to you;
- To allow you to participate in surveys, sweepstakes, contests and similar promotions;
- For our business purposes, including data analysis, developing and improving our products and services, and enhancing our Website; and
- To prevent fraud and enhance the security of our Website.

Online Behavioral Advertising

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. Through OBA, we hope to deliver advertisements that are most likely to be of interest to you using information about your other web-browsing activities (e.g., the web pages you visit, search terms you enter, and the way you move through our online services on your computer or device) or your personal profile (e.g., demographic or location information). Certain companies we work with may set cookies and use related tracking technologies, such as the clear GIFs discussed above, throughout our online

services or in our communications to support these OBA efforts. We do not currently offer an opt out of OBA.

How We Share Your Information With Third Parties

If you are a Partners member, we will use and share any information that we collect from or about you in accordance with our Privacy Notice and our Opt-Out Notice, which offers you certain choices with respect to the use and sharing of your personal information. Please click this link <https://www.partnersfcu.org/partners-federal-credit-union/privacy-policy> to see our Privacy Notice and our Opt-Out Notice.

Partners may share the information we collect from and about you with service providers with whom we work, such as data processors and companies that help us market products and services to you. When permitted or required by law, we may share information with additional third parties for purposes including response to legal process. Where appropriate, we will limit sharing of your information in accordance with the choices you have provided us in response to our Privacy Notice and Opt-Out Notice.

Except as described in this Policy, we do not partner with third parties for the purposes of engaging in online behavioral tracking, nor do we permit third parties to collect from the Partners Website personally identifiable information about your online activities.

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.

Updating Your Personal Information

Keeping your account information up-to-date is important. You can access and/or update your personal information in connection with your account or application by logging on to your account online or telephoning our Member Service Center at 1-800-948-6677.

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 Secure Socket Layer (SSL) technology. SSL is a security protocol for data transfer on the internet. This technology scrambles your account information as it moves between your PC's browser and Partners Federal Credit Union's computer system. This secure session helps protect the safety and confidentiality of your information when you bank with us online. We also limit access to your personal information to those who need it to do their jobs.

Linking to Other Websites

The Partners Website may contain links to third party websites. Although these links were established to provide you with access to useful information, Partners does not control and is not responsible for any

of these websites or their contents. We do not know or control what information third-party websites may collect regarding your personal information. Partners provides these links to you only as a convenience, and Partners 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 result that may be obtained from using them. We encourage you to review the privacy statements of websites you choose to link to from the Partners Website so that you can understand how those websites collect, use, and share your information. Partners is not responsible for the security or privacy practices of the linked websites.

Updates to this Online Privacy Policy

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