



PARTNERS FEDERAL CREDIT UNION ONLINE PRIVACY POLICY

Last Updated: March 6, 2024

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 our website, www.partnersfcu.org, and mobile application, Partners Mobile Banking. The term “us,” “we” or “our” in this Policy refers to Partners Federal Credit Union. References to “you,” “your,” and “yours” shall mean the members, customers, and website visitors and users of our app. The term “app” includes our mobile application that runs on smartphones, tablets, and other devices, through which you will be able to access online banking services. Unless otherwise stated herein, references to our online services shall refer to any services available to you through our website and/or app, including but not limited to, online banking services.

By using the online services, our website or our app, you agree to the terms and conditions of this Policy and consent to our online data collection activities as described in this Policy.

The terms “personal information” or “personally identifiable information” used in this Policy refers to information such as your name, mailing address, email address, telephone number, Social Security number, or other information that identifies you. This information may be collected when you voluntarily provide it to us on our website or in our app. The term “online activity data” refers to such information as IP address; browser type; display/screen settings; how you interact with our e-mails, websites and app, including your use of our online services; mobile device and advertising IDs; social media preferences and other social media data; location data (if you have enabled location services on your device); and other data that may be aggregated and may identify individual consumers/customers.

INFORMATION WE COLLECT ONLINE – AND HOW WE COLLECT IT

You may visit our websites to find out about products and services and check rates, without giving us any personal information. We may use software tools and/or “cookies” to track and gather information about your browsing activities in order to analyze usage, target areas for improvement, and create marketing programs to benefit our members or potential members that visit our site. Tracking may include the date and time of visits, pages viewed, time spent on our site, browser types, IP address, and the site visited just before and just after our site. As part of our security procedures for members using our online services to conduct account inquiries and transactions, we require personally identifiable information such as a login identification (username) and password. We may use a cookie to authenticate your request.

1) Use of Cookies and Similar Tracking Technologies

The use of cookies and similar tracking technologies (including pixels or clear GIFs, tags, and web beacons) is a common internet practice. Cookies are small text files containing small amounts of information which are downloaded to your computer, smartphone, tablet, or other mobile device when you visit a website. Cookies are useful in a number of ways, including allowing a site or mobile app you use to recognize your device, save your settings on a site or

mobile app, facilitate navigation, display information more effectively, and to personalize the user's experience. Cookies are also used to gather statistical information about how sites and mobile apps are used in order to continually improve design and functionality and assist with resolving questions regarding the sites and mobile app.

a. Attributes of Cookies

Cookies set by us are called first-party cookies. We may also have third-party cookies, which are cookies from a domain different than the domain of the website you are visiting, for our advertising and marketing efforts. There can be first-party and/or third-party cookies within any of the below Categories of Cookies.

Cookies have a duration period. Cookies that expire at the end of a browser session are called "session" cookies. Cookies that are stored longer are called "persistent" cookies. There can be session and/or persistent cookies within any of the below Categories of Cookies. Persistent cookies are stored on your system and can be accessed again for multiple visits. Persistent cookies usually have an expiration date and will be automatically deleted from your system at that time.

b. Categories of Cookies

Below is a list of the types of cookies that may be used on our websites. We classify cookies into the following categories:

Strictly Necessary Cookies. These cookies are necessary for the sites to function and cannot be switched off in our systems. Without these cookies, the sites and mobile apps will not work properly. Examples include setting your privacy preferences, setting your language preference, or logging in a secured area requiring authentication. Strictly necessary cookies may also detect transmission errors or data loss or distribute network traffic across different servers to ensure accessibility. You can set your browser to block or alert you about these cookies, but that will cause some parts of the site to not work.

Performance Cookies. These cookies allow us to count visits and traffic sources so we can measure and improve performance of our site. They help us know which pages are most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore do not personally identify the visitor. If you do not allow these cookies we will not know when you have visited our site, and will not be able to monitor its performance.

Functional Cookies. These cookies enable our site to provide enhanced functionality and personalization. They may be set by us or by third-party providers whose services we have added to our pages. If you do not allow these cookies, then some or all of these services may not function properly.

c. How to Control and Delete Cookies

1. Using Your Browser

Many of the cookies used on our websites can be enabled or disabled through our consent tool or by disabling the cookies through your browser. To disable cookies through your browser, follow the instructions usually located within the "Help," "Tools" or "Edit" menus in your browser. Please note that disabling a cookie or category of cookies does not delete the cookie from your browser unless manually completed through your browser function.

A growing number of browsers have adopted Global Privacy Control ("GPC"). The GPC is a technical specification designed to allow internet users to notify businesses of their privacy preferences, such as

whether they want their personal information to be sold or shared for behavioral advertising purposes. Where required to do so under applicable law, our websites will honor GPC opt-out signals.

2. Using Your Mobile Device

Some mobile devices come with a non-permanent advertising identifier or ID which gives companies the ability to serve targeted ads to a specific mobile device. In many cases, you can turn off mobile device ad tracking or you can reset the advertising identifier at any time within your mobile device privacy settings. You may also choose to turn off location tracking on your mobile device. By turning off ad tracking or location tracking on your mobile device, you may still see the same number of ads as before, but they may be less relevant because they will not be based on your interests.

3. Interest-Based Advertising on Third-Party Websites

Currently, we do not deliver interest-based advertising on third-party websites. All our advertisements to you are provided on our website pages and mobile application.

4. Cookies Consent Button on Our Website

You may notice a Cookies Consent link on our website. The purpose of this link is to get express consent before collecting and using data, enabling users to easily access and control their data as broad or specific as they'd like, and letting them opt out at any time.

5. Third-Party Website Cookies That We Cannot Control

When using our websites, you may be directed to other websites for activities such as surveys, completing job applications, and to view content hosted on those sites such as an embedded video or news article. These websites may use their own cookies. We do not have control over the placement of cookies by other websites you visit, even if you are directed to them from our websites.

2) Location Data

When allowed by you, our app collects your location data to provide you with location-based services, such as identifying branches and ATMs near you, and location-based messages and offers. Location access can be allowed once, only while using the app, or you can choose to not allow location data to be collected.

3) IP Addresses

If you log on to our websites to access our online services, including but not limited to the online banking page, you may pass through a "firewall" used for security purposes and the Internet Protocol (IP) address associated with the device you are using may be identified. In certain instances, it may also obtain other information about your device to better identify you as an online user. This information may be retained in case it is needed for security or protection of member information.

4) Social Media

We may collect information, such as your likes, interests, feedback, and preferences when you interact with our official pages on social media websites such as Facebook, X, LinkedIn, YouTube, and Instagram or from our social media partners (but only if you choose to share with them and they, in turn, share that information with us). Please refer to the policies of those companies to better understand your rights and obligations with regard to your activity on those websites.

5) Contact Information and Images

With your permission, our app may be granted access to your phonebook or contact information in your mobile device to provide various features like Zelle Payments. We will only disclose this information as necessary to enable such features and to comply with federal, state, or local laws, or other legal requirements.

Our app may request access to your camera for you to be able to use our remote deposit capture service. The front and back pictures of the checks you sent will only be used for our remote deposit capture service. Such images will only be accessible by us and our service providers that help enable our remote deposit capture service. We will only disclose the check photos to third parties if necessary to process your remote deposit and to comply with federal, state, or local laws, or other legal requirements.

Additionally, if you are applying for membership on our website, we may ask you to upload a copy of your government issued identification card for us to comply with our regulatory requirements. We will only use this information to open your account and disclose this information to third parties as necessary to process your membership application and to comply with federal, state, or local laws, or other legal requirements.

HOW WE USE INFORMATION WE COLLECT

We do not and will not sell your personal information. We share your information as required to meet legal and regulatory obligations. We share your personal information that you have provide to us in connection with applying for membership and/or financial products with us (“personally identifiable financial information”) with affiliates and third parties in accordance with the practices set forth in our general [Privacy Policy](#).

With respect to other information that we collect from you online, which includes personal information from the use of our online services as well as online activity data, we use such information for a variety of reasons, including:

- to present our websites and their contents to you;
- to enable you to use online tools or perform certain online transactions;
- to service and manage your account, including responding to or updating you on inquiries, or to contact you about your accounts or feedback;
- to offer you special products and services and deliver advertisements to you in the form of banner ads, interstitial pages (ads that appear as you sign in or sign out of your online accounts) or other promotions;
- to analyze whether our ads, promotions, and offers are effective;
- to help us determine whether you might be interested in new products or services, and to improve existing products and services;
- to verify your identity and/or location to allow access to your accounts and conduct online transactions;
- to manage fraud and data security risk;
- to personalize and optimize your website browsing and app experiences by examining which parts of our website you visit or which aspect of our apps you find most useful;
- to comply with federal, state or local laws; civil, criminal or regulatory investigations; or other legal requirements; and
- to share with trusted third parties who are contractually obligated to keep such information confidential and to use it only to provide the services we have asked them to perform.

WHO WE SHARE INFORMATION WE COLLECT WITH

We disclose your personal information and online activity data to third parties for only our business purposes and to comply with our legal requirements. The general categories of third parties that we share with are as follows:

- our third-party service providers;
- other companies to bring you co-branded services, products, or programs;
- third parties that help us advertise our products or services;
- 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;
- third parties or affiliates in connection with a corporate transaction, such as a sale, consolidation, or merger of our company or affiliated business; and
- 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.

MISCELLANEOUS

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: Protecting the confidentiality and security of your personal and financial information is our highest priority. We value your trust, and we understand that handling your financial information with care is one of our most important responsibilities. Our policies, procedures, and protections are always evolving to adapt to new strategies used by fraudsters. Our security measures include ensuring that our websites, online services, online banking, mobile banking, and online applications are hosted on secure servers, have SSL certificates, device safeguards, and secured files and buildings, as well as oversight of our third-party service providers that have access to your personal information and limiting our employees' access to your personal information on a need-to-know basis.

What You Can Do to Help Protect Your Information: We are committed to protecting your privacy. We suggest you follow these guidelines:

- Protect your account numbers, card numbers, personal identification numbers (PINs), and passwords. Never keep your PIN with your debit or credit card which would provide access to your accounts if your card is lost or stolen.
- Use caution when disclosing your account numbers, Social Security numbers, and other confidential information to other persons. If someone calls you, explains the call is on behalf of Partners and asks for your account number, you should beware. Our staff will have access to your information and will not need to ask for it.
- It is important that we have your current information so we may reach you. If we detect potentially fraudulent or unauthorized activity or use of any account, we will attempt to contact you immediately. If your address, phone number, or email changes, please let us know.

Linking to Other Websites: Our websites, online services, online or mobile banking may contain links to third party websites. Although these links were established to provide you with access to useful information, we do not control and are 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. We provide these links to you only as a convenience, and we do 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 link to from our websites so that you can understand how those websites collect, use, and share your information. We are not responsible for the security or privacy practices of the linked websites.

Protecting Children's Privacy: We respect the privacy of children and comply with the practices established under the Children's Online Privacy Protection Act (COPPA). We do not knowingly collect or retain personally identifiable information from consumers under the age of thirteen. For more information about COPPA please visit the Federal Trade Commission website: www.ftc.gov.

Data Retention: We may retain your personal information and online activity data even if you decide to terminate your membership with us, close your accounts with us, and/or delete our app or cease use of our websites based on the following:

- **Laws and regulations.** We are a regulated financial institution that is subject to laws and regulations governing our retention of information pertaining to our members, applicants for credit union membership, loans and other financial products and services. We are also an employer and, thus, we are subject to labor laws governing how long we must retain information about applicants for employment and current and former employees. Therefore, applicable laws and regulations will govern how long we retain information pertaining to you.
- **Fraud Prevention and Security.** We will retain information that we need for fraud prevention and security purposes.
- **Contracts** We will retain information for as long as necessary to comply with our contractual obligations to you, our service providers, and other third parties, as permitted by law.
- **Legal Claims and Defenses.** We may retain information for such a period as necessary or advisable to preserve legal claims and defenses.

Contact Us: If you have any questions regarding this Policy, call our Member Service Center at 1-800-948-6677.

Updates to this 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 our websites, online services, or online or mobile banking following these changes means that you accept the revised Policy.