



PO Box 2831  
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neighborsfcu.org

## Online Privacy Policy

Revised 03/17

At Neighbors Federal Credit Union ("NFCU," "we," "us" or "our"), trust has always been the foundation of our relationship with our members. We understand your desire for privacy, and we recognize that you trust us with your personal and financial information. Our Online Privacy Policy is designed to describe our privacy practices and principles in a format that is easy to navigate, read and understand. We pledge to treat your personal information with the utmost care and respect.

### Online Privacy Policy

This Online Privacy Policy (the "Policy") describes the treatment of information that is provided or collected through any of our online interfaces to which a copy of the Policy is posted, including [www.neighborsfcu.org](http://www.neighborsfcu.org) (the "Website"), applications we have placed on third party sites such as Facebook®, Twitter® and other social media services, and our mobile applications (the "Applications," and together with the "Website," the "Services"). It also explains how we collect, use and share information based on users' interactions with online advertisements, both on the Services and on online interfaces owned by third parties. Note that the Policy does not govern our privacy practices offline or with respect to information that is not provided or collected through the Services.

We pledge to use and share any information that we collect from or about our members in accordance with the NFCU Privacy Policy, which provides choices regarding our sharing and use of information. For additional information on this Policy or our privacy practices generally, please feel free to contact us directly with your questions.

While this Online Privacy Policy describes how we treat information, please be aware that additional terms and conditions may apply for certain parts of our Website and Applications.

### 1. Types of Information We Collect

We collect two basic types of information through the Services – personal information and anonymous information. We also collect location information in connection with certain of our mobile applications.

"Personal information" refers to information that identifies (whether directly or indirectly) a particular individual, such as information you provide on our forms, surveys, applications or similar online fields. Examples may include your name, postal address, email address, telephone number, Social Security number, date of birth or account information.

"Anonymous information" means information that does not directly or indirectly identify, and cannot reasonably be used to identify, a particular individual. Examples may include information about your Internet browser, information collected through tracking technologies, demographic information that you provide to us (e.g., your household income) and aggregated or de-identified data.

"Location information" means information that may be collected by certain mobile applications that identifies your physical location.

### 2. How We Collect Your Information

We collect personal information from you or about you when you provide this information to us directly. For example, we may obtain personal information when you request information, products or services from us, register on the Website or an Application, respond to surveys, contact customer support or otherwise interact with us. We may also receive information about you from other online and offline sources, such as public databases, social media platforms and other third parties.

In addition, we may collect information about your activity on the Services automatically using tracking technologies, such as cookies, Flash cookies and pixel tags. Definitions for the tracking technologies we use, as well as information regarding how to disable them, are available in the Online Tracking and Advertising section of the Policy.

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If you submit any personal information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Policy.

### 3. How We Use Information That We Collect

We may use information that we collect in order to, among other things:

- Provide you with, or evaluate your eligibility for, products and services that you request from us
- Communicate with you about your accounts or transactions with us
- Send you important information regarding the Services, changes to this Policy and/or other similar administrative information
- Allow you to participate in surveys, sweepstakes, contests and similar promotions, and to administer such promotions (note that these promotions may contain additional disclosures regarding our collection and/or use of your information)
- Send you offers and promotions for our products and services, or products and services that may be of interest to you;
- Personalize content and experiences on the Services;
- Verify your identity and/or location (or the identity or location of your authorized representative) for security, fraud prevention and other risk control purposes; and
- Provide you with advertising based on your activity on the Services and on third-party websites and applications
- Optimize or improve our products and services
- Detect, investigate and prevent activities that may violate our policies or be illegal
- Comply with our legal and regulatory obligations
- Enforce our terms and conditions and otherwise protect our rights and operations

### 4. How We Share Information That We Collect

We will not share your personal information outside of NFCU, except under limited circumstances. Please refer to the NFCU Privacy Policy for additional information regarding how we may share personal information, as well as the choices you may be able to exercise in connection with such sharing.

### 5. Online Tracking and Advertising

We and certain trusted service providers operating on our behalf collect information about your activity on the Services using tracking technologies, including:

#### Cookies:

Cookies are pieces of information that are stored directly on the device that you are using. They allow us to collect information such as the type of browser you are using, the amount of time you spend using the Services, the websites or applications you visit and the preferences you have set up for your accounts. We use this information for such purposes as to personalize your experience, enhance security, facilitate navigation, display material more efficiently, recognize the device that you are using to access the Services and understand how the Services are used. The Services do not use cookies that capture unencrypted personal information about you.

You can choose to have your device refuse to accept any cookies, and the majority of devices and browsers offer additional privacy settings for cookies. You do this through your browser settings. Each device and each browser is a little different, so look at your device Settings or your browser Help menu to learn the correct way to modify your cookies. If you turn cookies off, you will not have access to many features that make your user experience more efficient and some of the Services will not function properly. Please note that you will need to manage your cookie settings for each device and browser that you use.

#### Flash cookies.

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We may use local shared objects, sometimes known as Flash cookies, to store your preferences and to assist with online authentication by allowing us to recognize you and your device when you return to the Website or an Application. This permits us to display content based upon what you view on our websites and applications to personalize your use of the Services. Our advertisers and third-party service providers also may use Flash cookies to collect and store information. Flash cookies are different from browser cookies because of the amount and type of data, as well as how data is stored.

Cookie management tools provided by your device or browser will not remove Flash cookies. If you disable Flash cookies, you will not have access to many features that make your user experience more efficient and some of the Services are unlikely to function properly.

Pixel tags, web beacons, clear GIFs and other similar technologies. These are typically small pieces of data that are embedded in images on the Website, our Applications or certain e-mail communications. They may involve the transmission of information directly to us, to another party on our behalf or to another party in accordance with its privacy policy. We may use these technologies to bring together information we collect about you.

Location tracking on mobile devices. Certain applications on mobile devices may transmit information to us about your location when you request information from them. An example includes your physical location when you search for a nearby ATM using your mobile device. We may use that information to improve the products and services we provide to you as well as improving our services generally in your area.

Information collected through tracking technologies is used for many purposes including, for example, to:

- Provide useful features to simplify your experience when you return to the Services
- Deliver relevant content based on your preferences, usage patterns and location
- Monitor and evaluate the use and operation of the Services
- Analyze traffic on the Services and on websites or mobile applications of third parties

Other technologies. We may use other technologies, such as the capture of screenshots while you are using the Services, to understand how you navigate and use the Services. This information helps us to better understand how the Services are used and to improve them. We may associate this tracking data with your registration information, in which case we will treat it as personal information.

## **6. Other Information Collected Automatically**

Browser or Device Information: Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version, and the name and version of the Services (such as the Application) you are using. We use this information to ensure that the Services function properly.

Application Information: When you download and use an Application, we and our service providers may track and collect usage data, such as the date and time the Application on your device accesses our servers and what information and files have been downloaded to the Application based on your device number.

IP Address: Your IP address is a number that is automatically assigned to your computer by your Internet Service Provider. An IP address may be identified and logged automatically in our server log files whenever a user accesses the Services, along with the time of the visit and the page(s) visited. Collecting IP addresses is standard practice and is done automatically by many websites, applications and other services. We use IP addresses for purposes such as calculating usage levels, helping diagnose server problems and administering the Services.

## **7. Linked Websites**

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The Services may contain links to third-party websites not controlled by NFCU. We encourage you to be aware when you leave the Services and to read the privacy policies and terms of use of any such websites that may collect your personal information, as they will likely differ from those of the Services. NFCU does not guarantee and is not responsible for the privacy or security of these websites, including the accuracy, completeness or reliability of their information.

In addition, NFCU is not responsible for the information collection, use and disclosure practices (including the data security practices) of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer or provider, social media platform provider, operating system provider, wireless service provider or device manufacturer.

### **8. Data Security**

Your privacy is very important to us and we are committed to protecting your personal information from unauthorized access or use. We seek to use reasonable organizational, physical, technical and administrative measures to protect personal information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the "Contact Us" section below.

### **9. Preventing Identity Theft**

In order to help us protect your personal information, it is important that you always keep your account information safe. Never share your personal ID, password or PIN with anyone, under any circumstances.

Note that NFCU will never initiate a request via email for your sensitive information (e.g., Social Security number, personal ID, password, PIN or account number). If you receive an email asking for your sensitive information, you should be suspicious of the request and promptly contact us to report the suspicious activity.

Please be aware, however, that in certain telephone and in-person transactions we may ask for your full Social Security number, account number or other information to verify your identity before conducting the transactions you have requested. For example, we may ask for such information to verify your identity when you place a call to us, when you visit a NFCU branch office or when we call you about a new product or service we believe that you will find valuable. We will never request that you disclose your personal ID, password or PIN under any circumstances, including such telephone or in-person transactions.

Additional information regarding identity theft and the steps you can take to help protect yourself from fraud can be found on the Federal Trade Commission website ([www.ftc.gov](http://www.ftc.gov)).

### **10. Children's Privacy**

We do not use the Services to knowingly solicit personal information from or market to children under the age of thirteen (13) without parental consent. We request that such individuals do not provide personal information through the Services. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should promptly contact us and we will delete such information from our files. For additional information regarding the Children's Online Privacy Protection Act (COPPA), please visit the Federal Trade Commission website ([www.ftc.gov](http://www.ftc.gov)).

### **11. External Aggregation Services**

Some third-party companies offer aggregation services that allow you to consolidate your financial account information from a variety of sources, such that you can view all your account information at a single online location. For example, an aggregation service might collect and consolidate your checking and savings account balances at your credit union, the value of your stocks and bonds in your brokerage account and your frequent flier mileage information from an airline. In order to do so, the aggregator may request access to personal information - including identification information, account information, personal IDs and passwords - from you for each individual website.

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Please use caution when providing personal information to an aggregation service. By providing your user name, password or other credentials to an aggregation service you authorize that person or third party to initiate transfers to or from your account. Unauthorized transactions may not include transactions initiated by any person or third party to whom you provide your credentials.

Should you decide to revoke the authority you have given to an aggregation service, you should notify the aggregation service in addition to contacting us, in which case we may need to block your account until we issue new access codes.

## **12. Social Media Platforms**

We may interact with registered users of various social media platforms, including Facebook® and Twitter®. Please note that any content you post to such social media platforms (e.g., pictures, information or opinions), as well as any personal information that you otherwise make available to users (e.g., your profile), is subject to the applicable social media platform's terms of use and privacy policies. We recommend that you review this information carefully in order to better understand your rights and obligations with regard to such content.

## **13. Updating Your Information**

It is very important that you keep the information associated with your account accurate and up-to-date. If you believe that your account information is incomplete, inaccurate or otherwise not current, please contact us and provide us with the appropriate information. Alternatively, you may call or write to us at the telephone numbers or appropriate address for changes listed on your account statements, records, online or other account materials.

If you would like to review, correct, update, suppress or delete personal information that you have previously provided to us, you may contact us.

In your request, please make clear what personal information you would like to have changed, whether you would like to have it suppressed from our database or otherwise let us know what limitations you would like to put on our use of the personal information you have provided to us. For your protection, we may only implement requests with respect to the personal information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed.

## **14. Retention Period**

We will retain your personal information for the period necessary to fulfill the purposes outlined in this Policy, unless a longer retention period is required or permitted by law.

## **15. Changes to the Online Privacy Policy**

From time to time, we may make changes to this Policy in order to accommodate new technologies, industry practices, regulatory requirements or for other purposes. We encourage you to review the Policy periodically to ensure that you understand how we collect, use and share information through the Services. If we do make changes to the Policy, we will also update the "Effective Date" posted at the top of the Policy.

Any changes to the Policy will become effective when the revised Policy is posted on the Website, relevant Application or other NFCU online interface, as applicable. By continuing to use the Services following such changes, you are agreeing to accept the terms of the revised Policy.

## **17. Contact Us**

If you have any questions or comments about this Policy or our privacy practices generally, we encourage you to contact our member service department by calling (866) 819-2178. In the event you notice suspicious activity on your account or believe your personal ID, password or PIN has been compromised, please contact us immediately.

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