

At San Diego County Credit Union (“SDCCU” “Company” “we” “our” “us”), protecting our members' information is a priority. We have prepared this Online and Mobile Privacy Policy (“**Privacy Policy**”) to explain how we collect, use, protect and disclose information and data when you use the SDCCU website (“**Site**”) and any SDCCU mobile application, and other services offered by us (“**Services**”). This Privacy Policy also explains your choices for managing your information preferences, including opting out of certain uses of your Personal Information (defined below). This Privacy Policy applies to all users of the Site and Services.

BY USING THE SITE OR SERVICES, YOU ARE CONSENTING TO THIS PRIVACY POLICY. PLEASE READ IT CAREFULLY.

### 1. Managing Your Information Preferences

You can review, correct, update or change your Personal Information or opt out of receiving certain emails by changing the relevant settings in your account or by contacting us through [sdccu.com/contact](https://sdccu.com/contact). You are able to opt out of receiving marketing emails from us, however, you cannot opt out of receiving all emails from us, such as emails about the status of your account and notifications of monthly or quarterly account statements. If you have questions or concerns regarding this Privacy Policy, please contact us through [sdccu.com/contact](https://sdccu.com/contact).

### 2. Information We Collect

#### *Personal Information*

We collect information that personally identifies you, such as your name, address, phone number, mobile phone number, email, application form information, bank account and other financial information, your GPS coordinates and other location information and other personally identifiable information that you choose to provide us with or that you choose to include in your account (“**Personal Information**”). You may be asked to provide us with Personal Information when you create and account, submit an application or use any of our Services, and at other times.

#### *Usage Data and Site Activity*

We automatically collect information regarding the actions you take on the Site and Services (“**Usage Data**”). For example, each time you use the Site and Services, we automatically collect the type of Web browser you use, your operating system, your Internet Service Provider, your IP address, the pages you view, and the time and duration of your visits to the Site and Services. We use this information to help us understand how people use the Site and Services, and to enhance the services we offer.

#### *Cookies and Web Beacons*

Cookies are a feature of web browser software that allows web servers to recognize the device used to access a website or other online service. They are small pieces of data that are stored on a user's device by their web browser. Persistent cookies are stored on the computer's hard drive and are accessible until they expire or are manually deleted. Session cookies are temporary and are stored in the computer's memory until the web browser is closed. When using Internet Branch online banking, you are required to accept session cookies in order to be properly authenticated. Information gathered through cookies and web server logs may include information such as the date and time of visits, the pages viewed, time spent at the Site and Services and the websites visited just before and just after the Site. Cookies can remember what information a user accesses on one web page to simplify subsequent interactions with that website by the same user or to use the information to streamline the user's transactions on related web pages. This makes it easier for a user to move from web page to web page and to complete transactions over the Internet.

Web beacons, also known as “clear gifs,” “one-pixel gifs,” “web bugs,” “Internet tags” or “pixel tags” are small graphic images on a website or in an email that allow us and third parties to monitor the activity on the Site and Services or to make cookies more effective. This information also allows us and/or our Service Providers to target market our products and services to you during Internet sessions. You are not obligated to accept a cookie or beacon from the Site or Services, or any other website, and may modify your browser so that it will not accept cookies or beacons at your discretion. Certain features of the Site or Services may not work if you delete or disable cookies. Please see the “Advertising and Online Tracking” section of this Privacy Policy for additional information.

We use Google Analytics on the Site and Services to collect Usage Data, to analyze how users use the Site and Services, and to provide advertisements to you on other websites. For more information about how to opt out of having your information used by Google Analytics, visit <https://tools.google.com/dlpage/gaoptout/>.

### 3. How We Use Information and When We May Share and Disclose Information Generally

We use Personal Information for internal purposes only, such as to provide you with the Site and Services, including to send you alerts about your account, to improve the Site and Services, to notify you of new products or services and to otherwise communicate with you about our Company. We may also use your Personal Information to provide more relevant search results from the search functions of the Site and the Services. We will not disclose Personal Information to third parties, including for their direct marketing purposes, without your consent, except as explained in this Privacy Policy. We may disclose to third parties, certain Usage Data regarding the Site and Services. However, in such cases, your Usage Data is aggregated with the Usage Data of others and does not identify you individually.

### 4. Service Providers

From time to time, we may establish a business relationship with other businesses whom we believe trustworthy and who have confirmed that their privacy practices are consistent with ours (“**Service Providers**”). For example, we may contract with Service Providers to provide certain services, such as hosting and maintenance, certain features of the Services, data storage and management and marketing and promotions. We only provide our Service Providers with the information necessary for them to perform these services on our behalf. Each Service Provider must agree to use reasonable security procedures and practices, appropriate to the nature of the information involved, in order to protect your Personal Information from unauthorized access, use or disclosure. Service Providers are prohibited from using Personal Information other than as specified by us.

### 5. Advertising and Online Tracking

We may allow third-party companies to serve ads and collect certain anonymous information when you visit the Site and Services. These companies may use non-personally identifiable information, e.g. click stream information, web browser type, time and date, subject of advertisements clicked or scrolled over, during your visits to the Site and other websites in order to provide advertisements about goods and services likely to be of interest to you. These companies typically use a cookie to collect this information. Our systems do not recognize browser “Do Not Track” signals, but several of our Service Providers who utilize these cookies on our Site enable you to opt out of targeted advertising practices. To learn more about these advertising practices or to opt out of this type of advertising, you can visit

[networkadvertising.org](http://networkadvertising.org) or [aboutads.info/choices/](http://aboutads.info/choices/). We also provide you with additional tools to opt out of marketing from us. You can learn about this in the "Managing Your Information Preferences" section of this Privacy Policy.

#### **6. Location Information**

We use location based services provided by our Service Providers in order to customize our communications, offers, promotions and products to you ("**Location Services**"). Our Service Providers use the GPS coordinates and other location information from your device, if you have consented to the Location Services, to provide the Location Services. SDCCU and our Service Providers may also use this information to provide and to analyze and improve the Location Services and the Site and Services. If you no longer wish to use the Location Services, you may be able to disable them through our Services or your device's settings.

#### **7. Other Transfers**

We may share Personal Information and Usage Data with businesses controlling, controlled by, or under common control with our Company. If our Company is merged, acquired or sold, or in the event of a transfer of some or all of our assets, we may disclose or transfer Personal Information and Usage Data in connection with such transaction. You will have the opportunity to opt out of any such transfer if, in our discretion, it will result in the handling of your Personal Information in a way that differs materially from this Privacy Policy.

#### **8. Compliance with Laws and Law Enforcement**

We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We may disclose Personal Information and any other information about you to government or law enforcement officials or private parties if, in our discretion, we believe it is necessary or appropriate in order to respond to legal requests (including court orders and subpoenas), to protect the safety, property, or rights of our company or of any third party, to prevent or stop any illegal, unethical, or legally actionable activity or to comply with the law.

#### **9. Security Procedures**

We want you to use the Site and Services with confidence, knowing that the information you submit to us is secure. All submission forms on the Site and Services are encrypted. The encryption strength varies depending on the browser you are using. For submission form pages, you will see a Norton Secured powered by Symantec Seal. Symantec provides us with Internet security services for electronic communications over IP networks. Click on the Secured Seal to view the VeriSign certificate and additional information about their services and security. Additionally, many browsers display a secured lock symbol to indicate a secure connection. Emails that you may send to us outside the Site and Services may not be secure. For that reason, we ask that you do not send confidential information such as social security or account numbers to us through an unsecured email. For members, when you login to your account through the Site or Services, the SSL protocol is used to establish a secure and encrypted session with our server.

We maintain physical, electronic, and procedural safeguards to protect the confidentiality and security of information transmitted to us. However, no data transmission over the Internet or other network can be guaranteed to be 100% secure. As a result, while we strive to protect information transmitted on or through the Site or Services, we cannot and do not guarantee the security of any information you transmit on or through the Site or Services, and you do so at your own risk.

#### **10. Links**

We are not responsible for practices employed by websites of other companies linked to from the Site or Services, nor the information or content contained therein. We cannot, and do not, make any representations about the security, practices and policies of these companies, and are not responsible in any way for how these companies use cookies or any information you provide to them. This remains true even where the linked site appears within the parameters or window/frame of the Site or Services. Often, links to other websites are provided solely as pointers to information on topics that may be useful to users of the Site and Services. Please remember that when you use a link to go from the Site and Services to another web site, our Privacy Policy is no longer in effect. Your interaction on any other website, including websites which have a link to the Site and Services, is subject to that website's own rules and policies. Please read those rules and policies before proceeding.

#### **11. Children's Privacy**

The Site and Services are intended for users who are 13 years old or older. We do not knowingly collect Personal Information from children under the age of 13. If we become aware that we have inadvertently received Personal Information from a child under the age of 13, we will delete such information from our records.

#### **12. Data Processing in Other Locations**

Please be aware that your Personal Information and communications may be transferred to and maintained on servers or databases located outside your state, province or country. If you are located outside of the United States, please be advised that we process and store information in the United States. The laws in the United States may not be as protective of your privacy as those in your location. By using the Site or Services, you are agreeing to the collection, use, transfer and disclosure of your Personal Information and communications will be governed by the applicable laws in the United States.

#### **13. Privacy Policy Changes**

We may change this Privacy Policy from time to time. If we decide to change this Privacy Policy, we will inform you by posting the revised Privacy Policy on the Site. Those changes will go into effect on the "Revised" date shown in the revised Privacy Policy. By continuing to use the Site or Services, you are consenting to the revised Privacy Policy.

**PLEASE PRINT A COPY OF THIS PRIVACY POLICY FOR YOUR RECORDS AND PLEASE CHECK THE SITE AND SERVICES FREQUENTLY FOR ANY CHANGES.**