

# OnPoint Online Privacy Policy

**Last Updated: February 29, 2024**

OnPoint Community Credit Union (“**OnPoint**”) strives to serve your needs and to protect your identity and any information we collect about you.

Our Privacy Policy:

- covers your interaction with OnPoint, its affiliates, and companies engaged by OnPoint and its affiliates to render online services when you visit any mobile or online site or application that we own, including, but not limited to, our website (onpointcu.com) and our mobile applications (“**Services**”);
- describe the categories of personally identifiable information (“**Personal Information**”) that we may collect about you when you interact with or visit our Sites;
- describes the 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 Services;
- describe 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;
- describes how we safeguard children’s privacy.

This Online Privacy Policy, in combination with other relevant privacy notices that we provide to you (e.g., pursuant to financial privacy laws), inform you of the policies and practices regarding the collection, use, and disclosure of any personal information that we and our service providers collect from or about users in connection with our Services.

## **THE TYPES OF INFORMATION WE COLLECT**

Through your use of our Services, we may collect personal information from you in the following ways:

### **(a) Personal Information You Provide to Us.**

- When you enter data into an application for new products or services or when you use our products and services, we may collect personal information from

you, such as your first and last name, home or other physical address, e-mail, telephone number, and Social Security number.

- We will collect the financial and transaction information necessary to provide you with the Services, including account numbers, payment card expiration date, payment card identification, verification numbers, and transaction and payment history.
- At your request, we will collect images of checks and contact information to facilitate mobile check deposits and use of Zelle® Payments Service.
- If you provide feedback or contact us via email, we will collect your name and email address, as well as any other content included in the email, in order to send you a reply.
- We also collect other types of personal information that you provide voluntarily, such as any information requested by us if you contact us via email regarding support for the Services.

(b) **Personal Information Collected from Third Parties.** We may collect certain information from identity verification services and consumer reporting agencies, including credit bureaus, in order to provide some of our Services.

(c) **Personal Information Collected Via Technology.** We and our service providers may automatically log information about you, your computer or mobile device, and your interaction over time with our Services, our communications, and other online services, such as:

- Device data, such as your computer's or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers, language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G), and general location information such as city, state or geographic area.
- Online activity data, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Service, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access.
- Cookies, which are text files that websites store on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, and helping us understand user activity and patterns.

- Local storage technologies, like HTML5 and Flash, that provide cookie-equivalent functionality but can store larger amounts of data, including on your device outside of your browser in connection with specific applications.
- Web beacons, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened or that certain content was viewed or clicked.
- Location Information. If you have enabled location services on your phone and agree to the collection of your location when prompted by the Services, we will collect your location information data when you use the Services even when the app is closed or not in use; for example, to provide our fraud detection services. If you do not want us to collect this information, you may decline the collection of your location when prompted or adjust the location services settings on your device.

## **HOW WE USE YOUR INFORMATION COLLECTED IN THE APP**

(a) **General Use.** In general, we use your personal information collected through your use of the Services to respond to your requests as submitted through the Services, to provide you the Services you request, and to help serve you better. We use your personal information, in connection with the website and Mobile Apps, in the following ways:

- facilitate the creation of, and secure and maintain your account;
- identify you as a legitimate user in our system;
- provide improved administration of the Services;
- provide the Services you request, including use of *Zelle* Payments Service and mobile check deposit;
- improve the quality of experience when you interact with the Services;
- send you administrative e-mail notifications, such as security or support and maintenance advisories; and
- send surveys, offers, and other promotional materials related to the Services.

(b) **Compliance and protection.** We may use your personal information to:

- comply with applicable laws, lawful requests, and legal processes, such as to respond to subpoenas or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements and internal policies;
- enforce the terms and conditions that govern the Service; and

- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

(c) **Creation of Non-Identifiable Data.** The website and Mobile Apps may create de-identified information records from personal information by excluding certain information (such as your name) that makes the information personally identifiable to you. We may use this information in a form that does not personally identify you to analyze request patterns and usage patterns to enhance our products and services. We reserve the right to use and disclose non-identifiable information to third parties at our discretion.

## **DISCLOSURE OF YOUR PERSONAL INFORMATION**

To help deliver products, services, and content tailored to your online services and use, we may share aggregated and anonymous information with third parties.

We disclose your personal information collected through your use of the Services as described below.

(a) **In Accordance with Our Other Privacy Notices.** Other than as described in this Privacy Policy in connection with the website and Mobile Apps, this Privacy Policy does not apply to the processing of your information by us or third parties with whom we share information.

(b) **Third Party Service Providers.** We may share your personal information with third party or affiliated service providers that perform services for or on behalf of us in providing the website and Apps, for the purposes described in this Privacy Policy, including to provide you with the Services; to conduct quality assurance testing; to facilitate the creation of accounts; to optimize the performance of the Services; to provide technical support; and/or to provide other services to the website and Apps.

(c) **Authorities and Others.** Regardless of any choices you make regarding your personal information, the website and Apps may disclose your personal information to law enforcement, government authorities, and private parties for the compliance and protection services described above.

## **LINKS TO OTHER SITES**

The website and Apps may contain links to third party websites. When you click on a link to any other website or location, you will leave the website and/or Apps and go to another site. Another entity may collect personal and/or anonymous information from you. The website and/or App's provision of a link to any other website or location is for your convenience. It does not signify our endorsement of such other website or location or its contents. We have no control over, do not review, and

cannot be responsible for, these outside websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these outside external websites. We encourage you to read the privacy policy of every website you visit.

## **YOUR CHOICES REGARDING YOUR INFORMATION**

You have several choices regarding use of information on the Services.

(a) **How We Respond to Do Not Track Signals.** Some web browsers transmit “do not track” signals to the websites and other online services with which your web browser communicates. There is currently no standard that governs what, if anything, websites should do when they receive these signals. We currently do not take action in response to these signals. If and when a standard is established, we may revise its policy on responding to these signals.

(b) **Access, Update or Correct Your Information.** You can access, update or correct your information by changing preferences in your account. For additional requests, please contact us.

(c) **Opting Out of Email or SMS Communications.** If you have signed-up to receive our email marketing communications, you can unsubscribe any time by clicking the “unsubscribe” link included at the bottom of the email or other electronic communication. Alternatively, you can opt out of receiving marketing communications by contacting us at the contact information under “Contact Us” below. If you provide your phone number through the Service, we may send you notifications by SMS, such as provide a fraud alert. You may opt-out of SMS communications by unlinking your mobile phone number through the Services.

(d) **Opting Out of Location Tracking.** If you initially consented to the collection of geo-location information through the Services, you can subsequently stop the collection of this information at any time by changing the preferences on your mobile device. Please note, however, that if you withdraw consent to our collection of location information, you may no longer be able to use some features of the App.

## **SAFEGUARDS AND RETENTION**

We implement reasonable administrative, technical, and physical measures in an effort to safeguard the information in our custody and control against theft, loss, and unauthorized access, use, modification and disclosure. Nevertheless, transmission via the internet is not completely secure, and we cannot guarantee the security of your information.

## **A NOTE ABOUT CHILDREN**

The Services are not directed towards individuals under the age of 13 without obtaining consent from a parent or legal guardian and we do not, through the website or Apps, intentionally gather personal information about visitors who are under the age of 13. If a child under the age of 13 submits personal information to us through the website or Apps, and we learn that the personal information is the information of a child under 13, we will attempt to delete the personal information of the child under 13 as soon as possible.

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

## **PRIVACY POLICY UPDATES**

This Privacy Policy is subject to occasional revision. We will notify you of any material changes in its collection, use, or disclosure of your personal information by posting a notice on the Services. Any material changes to this Privacy Policy will be effective thirty (30) calendar days following notice of the changes on the Services. These changes will be effective immediately for new users of the Services. If you object to any such changes, you must notify us prior to the effective date of such changes that you wish to deactivate your account. Continued use of the Services following notice of any such changes shall indicate your acknowledgement of such changes.

## **CONTACT US**

If you have any questions or complaints about this Privacy Policy or the website or the App's data collection or processing practices, or if you want to report any security violations to the website and/or App, please contact us at 1-800-527-3932 or by visiting [OnPoint Member Assistance](#) or by mail:

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