

Online and Mobile Privacy Policy

North County Credit Union (referenced herein as "Credit Union," "we," "us" or "our") strives to serve your needs and is committed to protecting your identity and any information we collect about you.

This Online and Mobile Privacy Policy explains how we collect, use, protect, and disclose information and data when you visit any online, mobile site, or application that we own including, but not limited to, our website, northcountycu.org, and our mobile apps ("Sites"). Our separate <u>Federal Privacy Policy</u>, along with this Online and Mobile Privacy Policy, describes the privacy and data security practices we follow.

By using these Sites, you are consenting to this Online and Mobile Privacy Policy.

1. Information We Collect

We may collect personal information when you enter data into an application for new products or services, when you use our products and services, from locations initiated from our Sites or when you otherwise interact with us on our Sites. Personal information may include your name, home or other physical address, social security number, telephone number, and email address. We do not collect personal information from you when you simply browse our Sites. However, our Sites may collect non-personal information such as your IP address and device identifier.

We take your online privacy seriously and make the safeguarding of your personal information a priority. We collect personal information only as allowed by law. Use of the internet makes it possible for other parties to collect data about your online activities over time and across different websites, including when you use our Sites.

2. With Whom Do We Share the Collected Information?

We may share your personal information with affiliates in accordance with the practices set forth in our <u>Federal Privacy Policy</u>. We do not sell your personal information. We may use or share your non-personal information to enhance your experience on our Sites, to help deliver our advertisements on your web browser, and to measure advertising campaign effectiveness. We may also share your personal information and non-personal information as required to meet legal and regulatory obligations.

3. What We Do With The Information We Collect

We use this information to understand your needs and provide you with better service. We may use it in the following ways:

- Internal record keeping
- To improve our products and services
- To periodically send promotional emails
- To occasionally contact you for market research purposes
- To customize the website according to your interests

For Analytics, Display Advertising and Interest-Based Advertising

North County Credit Union implements the following Google Analytics features based on Display Advertising: Remarketing, Google Display Network Impression Reporting, and Google Analytics

Demographics and Interest Reporting. We utilize these services to serve more relevant advertising experiences across the web based on previous visits to our website.

North County Credit Union and third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the AdWords & DoubleClick cookie) to do the following:

- To inform, optimize, and serve advertising based on visits to our website
- To report how our advertising impressions, other uses of advertising services, and interactions with these advertising impressions and advertising services are related to visits to our site.

North County Credit Union uses data from Google's Interest-based advertising or 3rd-party audience data (such as age, gender, and interests) with Google Analytics to serve more relevant advertising experiences across the web based on previous visits to our website.

For Facebook Remarketing and Custom Audiences

Third parties may use cookies, web beacons, and similar technologies to collect or receive information and use that information to provide measurement services and target ads.

How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyze web traffic. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We also use traffic log cookies to identify which of our site pages are used. Cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any personal identity information. You can decline cookies within your web browser settings.

4. How You Can Control Your Information

You may disable or remove cookies by accessing your web browser settings. Our Sites will still function without cookies, but some features may not work properly. Please note that due to a lack of consistent standards across browsers, our Sites may not respond to "do not track" browser settings. We do not monitor your online activities after you leave our Sites. We only use your personal information for certain purposes allowed by law (refer to our <u>Federal Privacy Policy</u>), which you cannot limit. Additionally, you cannot opt out of our sharing non-personal information such as your IP address and device identifier.

You may, however, be able to opt out of certain advertisements. To learn more about a particular advertising network (including how to opt out), click on the industry group network symbol or link located on the advertisement. To learn more about these advertising practices or to opt out of this type of advertising, you can visit networkadvertising.org. We also provide you with additional tools to opt out of marketing from us. You can learn more about this in the "Managing Your Information Preferences" section of this Online and Mobile Privacy Notice.

5. Managing Your Information Preferences

If your email address is on record with us, we may periodically send you educational or informational communication about products, services, or events that we believe may interest you. Instructions for how you can stop or unsubscribe from receiving these messages are included in each communication that we send. However, we will still communicate with you in connection with servicing your account, fulfilling your request, or about any promotion, service, or program in which you have elected to participate.

6. What Happens When You Send Information To Us Or Transact With Us Online

Whenever you submit information to us using methods we make available to you on our website, we protect your information using administrative and technical processes along with strong industry standard encryption recommended for financial institutions. There is a serious risk that your information could be intercepted if you send information using a method outside of our website, such as sending an email from your home email server or posting a message to us through a social media website. To send us a secure message, you should only use our **encrypted email form** found on our website. Alternatively, you can call us during business hours at 855-487-1880.

7. Third Party Sites Including When Other Websites Display Our Advertisements

We are not responsible for the content, practices or policies of any other party or any non-North County Credit Union website you visit, including any social media sites in which we display information, or any website whose link appears within our website, and regardless of any affiliation we may share with any other entity. Before providing any personal or identifiable information, you should first review the policies of any website you are visiting. The fact that there is a link between our website and that of another website does not represent an endorsement by us of the content and any product, service, or program contained on any other website. Advertising we place on other websites may contain a "tag," which is a code that tells us that our advertisement was reviewed at the sponsoring website. Tags do not contain personal or identifiable information and are only a marketing tool for measuring the effectiveness of placing our advertising on other websites.

8. 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, such as data storage, management, 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 North County Credit Union. When permitted or required by law, we may share your personal information with additional third parties for other purposes, such as responding to legal process.

9. 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 our Site, 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.

10. Children's Online Privacy

The Credit Union does not knowingly collect, maintain, or use personal information from our website about children under the age of 13. We request that these individuals do not provide personal information through the site without parental consent. For more information about the Children's Online Privacy Protection Act (COPPA), visit the FTC website at www.ftc.gov.

11. Keeping Your Information Accurate

It is important that we have accurate and up-to-date information about you. If you notice that your information is incomplete, inaccurate, or out of date, please contact us at 855-487-1880 or visit a

branch. You can also review and request changes to certain personal information such as your email address, mailing address, and telephone number on our Sites.

12. Changes

We reserve the right to update and change this Online and Mobile Privacy Policy from time to time. If we update this Online and Mobile Privacy Policy, the changes will be effective when we post the update to this webpage. The date of the most recent update will always be shown below. You agree that it is your responsibility to check this Online and Mobile Privacy Policy on this webpage periodically for any changes.

13. Notice for California Residents

If you are a California resident, please refer to our <u>California Consumer Privacy Notice</u> for additional information about your rights under the California Consumer Privacy Act of 2018.

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