



## Online Privacy Notice

This Online Privacy Notice (the "Notice") describes how information is collected by and through websites, mobile applications, and other online interfaces or platforms that are owned, operated, or controlled by Empeople Credit Union or its affiliated companies (collectively, the "Sites"), including this Site, and how that information may be used and shared. By accessing or using any Site, you confirm your consent and agreement to the terms of this Notice as may be in effect at that time.

For purposes of this Notice, the terms "we", "us", and "our" refer to Empeople Credit Union that owns, operates, or controls the Site that you use, and such terms may also refer to contractors and service providers engaged by the Credit Union to support their business activities, as the context may require. The terms "you", "your" and "yours" refer to any person who accesses or uses a Site.

This Notice supplements, but does not replace, the general Website Terms of Use for the use of this Site. In the event of a conflict between the terms of this Notice and the terms of the general Website Terms of Use, the terms of this Notice will govern and control with respect to the matters addressed in this Notice. Certain sites may have separate privacy notices or terms and conditions that are specific to those Sites, and when you use or access those sites those separate privacy notices or terms and conditions will apply and will control with respect to the matters addressed therein in the event of a conflict with the terms of this Notice.

With regard to persons who use or obtain our products and services for their own personal, family, or household purposes, this Notice also supplements, but does not replace, and should be read in conjunction with the Empeople Credit Union [Privacy Notice](#). To the extent that any information at issue is "nonpublic personal information" as defined by Title V of the Gramm-Leach-Bliley Act (Public Law No. 106-102) and applicable related regulations, the Empeople Credit Union Privacy Notice will apply and control in the event of a conflict with the terms of this Notice, subject to the requirements and provisions of applicable law.

As applicable -- California residents also should refer to our California Consumer Privacy Act Disclosure. In the event of a conflict between the terms of this Notice and the terms of the California Consumer Privacy Act Disclosure, the terms of the California Consumer Privacy Act Disclosure will govern and control as to California residents.

**Information We Collect Through Our Sites** Personal information collected through our Sites includes information you provide directly when completing forms or transacting with us, such as your name, your home address, your email address, your telephone number, your social security number, your account number, or transaction information. We also collect information that you do not provide directly, such as information about your device (including, but not limited to, behavioral biometrics relating to your use of your device for identity verification, fraud avoidance, and security purposes) or internet browser, information obtained from cookies that have been placed on your device or internet browser at our Sites or at other websites you have visited, demographic information, aggregated information, blind information about how you use our products and services and about the transactions you perform using our products and services, and other information obtained through your access to or use of a Site. We may supplement the information we collect from you with information we receive about you from other sources.



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**How We Collect, Use and Share Personal Information You Provide to Us Directly** We collect personal information when you use our Sites to apply for, obtain, or use our products and services, to make inquiries about our products and services, or to provide information and feedback about our products and services. In connection with your use of our Sites, products, and services, we may ask for, and you may provide, personal information in forms, surveys, applications, and online fields, or you may authorize us to collect personal information from third party sources. We may use personal information and share it with our service providers:

- To respond to your inquiries and requests, and to send you notifications.
- To send administrative information to you, such as information regarding the Site and changes to our terms, conditions and policies.
- To complete and fulfill your applications for our products and services and to deliver and perform such products and services, to execute inquiries and transactions you have requested, to communicate with you regarding products and services you have obtained from us, and to provide you with related customer service.
- To verify your identity or location for security purposes.
- To send you marketing communications that we believe may be of interest to you and otherwise for advertising and sales purposes, whether online or through offline channels like branches, call centers, and direct marketing (for example email, mail, and phone).
- To personalize your experience on the Site by presenting products and offers tailored to you.
- As you agree, authorize, or consent in agreements, terms, and conditions you agree to or accept in connection with products and services you obtain from us.
- For our business purposes, including (but not limited to) such purposes as (i) data analysis, (ii) audits, (iii) fraud monitoring and prevention, (iv) new product development, (v) enhancing, improving, or modifying our products and services, (vi) identifying usage trends, (vii) determining the effectiveness of our promotional campaigns, and (viii) operating and expanding our business activities.
- As we believe to be necessary or appropriate (i) under applicable law, (ii) to comply with legal process and otherwise to comply with applicable laws, rules, and regulations, (iii) to respond to lawful requests from public and government authorities, (iv) to enforce our terms and conditions, (v) to protect our operations or those of any of our affiliates, (vi) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others, and (vii) to allow us to pursue available remedies or limit the damages that we may sustain.

For additional information about how we collect, use, share, and protect personal information about our consumer customers, and for information about the choices you may have, please review Empeople Credit Union [Privacy Notice](#).

**Updating Personal Information, You Provide to Us Directly** Online applications you use at our Sites in connection with our products and services generally will enable you to review, update and correct certain personal



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information. You may also contact your Member Services, or call us at (207) 854-6000, for information about how to review and update certain information about you in our records.

**How We Collect, Use and Share Personal and Other Information You Do Not Provide to Us Directly** We may collect information you do not provide to us directly:

- Through or from your device or browser or cookies that have been placed on your browser. Certain information is collected by most browsers, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system version and internet browser type and version. We use this information to ensure that the Sites function properly and to maintain security.
- Using pixel tags and similar technologies. Pixel tags (also known as web beacons and clear GIFs) may be used in connection with some Site pages and HTML-formatted email messages in order to, among other functions, track the actions of users and email recipients, measure the success of our marketing campaigns and compile statistics about Site use and response rates.
- Using your IP address. Your IP address is a number that is automatically assigned by your internet service provider to the computer or device that you are using. An IP address is identified and logged automatically in our server log files whenever a user visits a Site, along with the time of the visit and the pages that were visited. We use IP addresses for purposes such as calculating Site usage levels, helping diagnose server problems, and administering the Sites.
- Using geolocation and other location information transmitted by your device, if you have enabled location services on the device, and using behavioral biometrics relating to your use of your device for identity verification, fraud avoidance, and security purposes

We may use, disclose, and share information you do not provide to us directly as described in this Notice (including using and sharing such information with our service providers for the purpose of sending you marketing communications that we believe may be of interest to you and otherwise for advertising and sales purposes, whether online or through offline channels like branches, call centers, and direct marketing (for example, email, mail, and phone)) or as otherwise permitted or required by applicable law.

**How do we use Google Analytics?** We use Google Analytics to better understand how users are visiting and using our Sites. We do not use Google Analytics to track, collect or upload any data that personally identifies an individual (such as name, address, or email address) or other data which can be reasonably linked to such information by Google. We do not receive personally identifiable information about users on our Sites. You may review further information about how Google Analytics collects and processes data and how to control the information sent to Google at "How Google uses information from sites or apps that use our services" at <https://policies.google.com/technologies/partner-sites>.

**Cookies** We use cookies to provide you with a better online experience. A cookie is a small text file that can be placed on your system when you visit a website. Cookies allow us to collect information such as browser type, time spent on a website, pages visited, language preferences, and information about your relationships with us. Cookies also allow us to facilitate image changes, collect anonymous aggregate website traffic, provide certain discount, promotional and reward programs to you, and personalize our services to your needs. Our Sites do not require



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users to accept cookies, and you can set your browser to notify you when you receive a cookie, giving you the opportunity to decide whether or not to accept it. If you choose not to accept cookies, you may experience some reduction in functionality depending on which Site you are using. You also may need to accept cookies in order to maintain certain online advertising opt-out elections (see “Use of Information for Advertising; Online Behavioral Advertising” section below).

**Use of Information for Advertising; Online Behavioral Advertising** We may use personal information in connection with our online advertising activity. Online advertisements may be in the form of banner ads, splash ads, or other formats. These advertisements may appear on our Sites, and we may contract with third party advertising companies to promote our products and services and serve related advertisements on websites and mobile applications that are owned or operated by parties not affiliated with us.

In order to better understand which of our products and services may be of interest to you and to tell you about those products and services, we may from time to time collect information about your online activities over time and across third party websites and online services. We also may engage third party service providers to collect information about your online activities over time and across third party websites and online services when you use our Site. Serving advertisements based on a person’s online activities over time and across third party websites and online services is generally known as “online behavioral advertising.” Here are some tips and other important information regarding online behavioral advertising:

- If you are given an opportunity to opt out from online behavioral advertising and you make an opt-out election, then in order to maintain the opt-out election at our Sites and at other websites that might serve behavioral advertisements on our behalf, your browser must be enabled to accept cookies. If you delete cookies, buy a new device, access our Sites or other websites from a different device, login under a different screen name, or change web browsers, you will need to opt out again.
- You also may be able to avoid online behavioral advertising by disabling scripting in your browser. Please check the security settings in your browser to determine the status of scripting settings. However, please note that if you disable scripting, you may be unable to use certain features on a website. In other cases, the website may become inoperable, your experience may not be optimal, you may not be using the latest standards for safe and secure transactions, or you may not be allowed to access the site.
- Some browsers may provide a “do not track” or similar setting. Our Sites do not respond to such settings. If you enable such a setting it will not prevent the collection of information about your online activities over time and across third party websites when you visit our Sites.
- You should be aware that even if you exercise a choice not to receive targeted advertisements in connection with online behavioral advertising, your election does not necessarily stop the collection of information about your online activities over time and across third party websites and online services for purposes other than online behavioral advertising.
- You may still receive generic advertising (i.e., advertising that is not based on your online activities over time and across third party websites and online services) even if you opt out of online behavioral



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advertising, and opting out of online behavioral advertising may not result in the termination of advertising and promotions provided in connection with rewards programs we may offer.

We may share personal information with third-party advertising companies with which we have contracted in order to support other targeted advertising, promotional, and rewards programs that we offer.

**Social Media** We may from time to time use social media websites and applications (e.g., Facebook®, Twitter®, YouTube® and LinkedIn®) to interact with you and to communicate information about us and about our products and services. We may collect information from our interactions with you at such social media websites and applications, and we may use the information for the purposes and uses described in this Notice. Please review our Social Media & Community Guidelines for more information. If we disclose any terms of use at specific social media pages that we manage, you also will be subject to those terms when you interact with those pages. The owners and operators of social media websites and applications may impose their own terms of use and privacy policies with respect to the use of their websites and applications. This Notice does not govern the use, handling, and treatment of content you may post at social media websites and applications by the owners and operators of those websites and applications. You should review the terms of use and privacy policies of any social media website or application that you use to make sure you understand your rights and obligations with regard to content that you post.

**Children's Online Privacy** Our Sites are not targeted to individuals under thirteen (13) years of age. We do not knowingly collect information from children under 13 without parental consent. Click [here](#) for more information about children's online privacy.

**Medical Information** When you use our Sites to apply for or to obtain or use our products and services, we will not ask you to provide any personal health or medical information except as allowed or required by applicable law and as necessary to consider your application for or to provide such products and services. To the extent you provide any medical or personal health information, we will not use or disclose such information except as allowed or required by applicable law, and we will protect such information as required by applicable law.

**Security** Empeople Credit Union uses commercially reasonable administrative, technical, and physical security measures to protect personal information collected through the Sites. These measures include computer safeguards and secured files and buildings. In the event we share information with third party service providers or joint marketers, we restrict the ability of such parties to use or disclose the information we furnish. We also require such parties to apply appropriate security measures to protect information. We retain your information for as long as needed: (i) to conduct business with you; (ii) as needed for the purposes outlined in this Notice or at the time of collection; or (iii) as necessary to comply with our legal obligations, resolve disputes, and enforce any agreements. For more information, please review the Empeople Credit Union's [Privacy Notice](#). Unfortunately, no data transmission or storage system can be guaranteed to be absolutely secure, and we disclaim any representation or warranty that our information security systems or those of our service providers and joint marketers are invulnerable to breach or compromise.



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**Links to Other Websites** The information and disclosures contained in this Notice apply only to our Sites. If you link to a third-party website from our Sites, the third-party website will not be governed by this Notice. We recommend that you review the internet or online privacy notice for any third-party website you visit, including any social media website or application (see “Social Media” section above).

**Information about Parties that Are Not Natural Persons** Notwithstanding any term or provision to the contrary in this Notice, any information collected by or through the use of any Site that describes, identifies, or relates to a party that is not a natural person may be used, disclosed, and shared by us for any lawful purpose, subject to the requirements and restrictions of applicable law.

**Changes to this Notice** We may change our privacy practices and amend this Notice at our discretion. Any changes or amendments we make will be effective when we post them at the applicable Site, unless we expressly provide a different effective date. You agree that the posting of such changes or amendments at the applicable Site shall constitute effective notice thereof to you. You agree to review the Notice periodically to ensure that you are familiar with the current terms of this Notice. You acknowledge and agree that any changes we make are binding on you as of the effective date we dictate, but in any event your use of the applicable Site on or after the effective date constitutes your affirmative acceptance of such changes. The effective date set forth at the beginning of this Notice indicates when this Notice was last changed. If our changes or amendments to this Notice are material, we will notify you in accordance with applicable law.

**Questions about this Notice** If you have questions about this Notice, please call us at (800) 338-6739 or visit our [website](#) for more information.