

## **CITADEL FEDERAL CREDIT UNION ONLINE PRIVACY AND SECURITY POLICY**

**Effective March 23, 2017**

Citadel Federal Credit Union ("Citadel") understands the importance of protecting your privacy. This online privacy and security policy ("policy") describes how Citadel collects, uses, shares, and protects information when you visit or use [www.citadelbanking.com](http://www.citadelbanking.com) ("the Website").

### **Types of Information We Collect**

When you visit and browse the Website, we are able to collect information that could be reasonably used to indirectly identify you individually, such as your physical location, the device you are using and the Internet Service Provider (ISP) you are using. We can also record the date, time, and pages visited while you are at our site and the type of web browser and operating system you use. We do this to determine how individuals use the Website and services so that we can enhance a user's experience and make the Website and services more useful for customers.

When you request information or make an application for services, we collect personally identifiable information that you provide to us directly, such as by completing an online form, application, field, or survey. Personally identifiable information means information that directly identifies you or can be used to directly identify you. Examples may include your name, mailing address, phone number, email address, date of birth, social security number, driver's license number, and account numbers. We will retain your personal information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

In addition to the personal information described above, we also collect anonymous demographic information, which is not unique to you, such as your zipcode, region, preferences, interests, and favorites. When you use our online or mobile banking services, you also may be required to enter information we believe is necessary to safely process your transaction, such as your digital banking Login ID and password.

### **How We Collect Information**

- **Browser Cookies** – Cookies are pieces of data that are stored directly on your computer, smartphone, or other internet access device. They are assigned by a web server to the browser on your device and allow us to recognize your device and store user preferences for when you return to the Website. Information gathered through the use of cookies may be used to make offers to you via online ads, email, U.S. mail or telephone, subject to the privacy preferences you have on file with Citadel. We do not embed your Social Security number, account number(s), or passwords into our cookies. Cookies we use do not contain or capture unencrypted personal information. You can refuse to accept these cookies and most devices and browsers offer their own cookie privacy settings. You'll need to manage your cookie settings for each device and browser you use. If you do not accept these cookies or clear cookies regularly, your experience while visiting our website may be less than optimal. For online and mobile banking users, non-acceptance or removal of cookies will require a new secure access code for each session.
- **IP Address** – Your IP Address is a number automatically assigned to the device you're using by your Internet Service Provider (ISP). An IP address is identified and logged automatically in our server log files whenever a user visits the Website, along with the time of the visit and the page(s) that were visited. Collection of IP addresses is standard practice on the internet and is done automatically by many websites. We use IP addresses for purposes such as calculating site usage levels, helping diagnose server

problems, to personalize/tailor your experience while engaging with us online and offline, for compliance and security purposes, for advertising and administering the Website.

- **Aggregated Data** – Aggregated Data is data that we may create or compile from various sources, including but not limited to, accounts and transactions. We use this information, which does not identify individual account holders, for our business purposes, which may include offering products or services, research, marketing, or analyzing market trends and other purposes consistent with applicable laws.
- **Social Media Sites** – Citadel has a presence on social media platforms including, but not limited to, Facebook, Twitter, LinkedIn, and Google+ that enable online sharing and collaboration among users who have registered to use such sites. Any content, such as pictures, information, or opinions that you post on social media pages, or any Personal Information that you make available to other participants on these social platforms, is subject to the terms of use and privacy of those hosting platforms.
- **Do Not Track Signals (“DNT”)** – Do Not Track Signals refer to an HTTP header used by Internet web browsers to request a web application disable its tracking or cross-site user tracking. When DNT is enabled, a user’s web browser adds a header to content requests indicating that the user does not want to be tracked. California law requires us to disclose how we respond to web browser DNT signals. We do not respond to or take any action with respect to a DNT configuration set in your internet browser, and therefore, do not disable tracking.
- **Social Security Numbers** – As required by law, in the normal course of business, Citadel collects Social Security numbers in establishing, maintaining, and servicing member accounts. We implement reasonable measures to protect the confidentiality of Social Security numbers, to prohibit unlawful disclosure of Social Security numbers, and to limit access to Social Security numbers.

### **How We Use Information**

We may use your personally identifiable information to, among other things:

- Open an account for you, enroll you for services, or complete your transactions;
- Respond to your requests for information and otherwise communicate with you;
- Provide you with information about products and services that we, or third parties with whom we do business, offer or make available;
- Send you notices or alerts concerning your account or account transactions;
- Send you marketing communications that we believe may be of interest to you;
- Allow you to participate in surveys, sweepstakes, contests, or similar promotions;
- Detect and prevent activities that may violate our policies or be illegal; and
- Comply with our legal and regulatory obligations.

### **How We Share Information with Third Parties**

In order to conduct the business of the Credit Union, we may share your member information with companies that work with us to provide you products and services that you’ve requested or already have with us. We will use and share any information that we collect from or about you in accordance with our Privacy Policy. Please click this link <https://www.citadelbanking.com/privacy> to see our Privacy Policy.

When permitted or required by law, we may share information with additional third parties for purposes including response to legal process. Where appropriate, we will limit sharing of your information in accordance with the choices you have provided us in response to our Privacy Notice and Opt-Out Notice.

### **Linking to Other Websites**

We may provide links to third party websites, such as credit bureaus, service providers, or merchants. If you follow links to websites not affiliated or controlled by Citadel, we recommend that you review their privacy and security policies and other terms and conditions, as they may differ from our sites. Citadel does not guarantee, and is not responsible for, the privacy or security of these websites, including the accuracy, completeness, or reliability of their information.

### **Security**

To protect your personal information from unauthorized access and use, we use security measures that comply with federal and state laws. These measures may include device safeguards, secured files and buildings, as well as oversight of our service providers to ensure your information remains confidential and secure. You should take additional security precautions as you deem appropriate.

### **Children's Online Information Privacy**

Our Website is not intended for children under the age of 13. We do not knowingly collect, maintain, or use personally identifiable information from the Website about children under the age of 13 without parental consent. For more information about the Children's Online Privacy Protection Act (COPPA), please visit the Federal Trade Commission website at [www.ftc.gov](http://www.ftc.gov).

### **User Generated Content**

You understand and agree that any content associated with your Submission may be used by Citadel and you understand and agree that: (a) your Submission may become viewable by the public on a Citadel website or elsewhere; (b) Citadel and its licensees and affiliates have the right to publish not only the Submission, but also the Submitter's name and/or username and photo associated with the applicable Social Media Platform where the Submission was posted, in any advertising medium, publicity, marketing, programming, and promotional materials without compensation unless prohibited by law; (c) you are the sole owner of your Submission or have permission to submit from the owner(s), in which case you will provide Citadel a copy of a written consent from the owner(s), upon request; and (d) your Submission constitutes a waiver of the right to privacy or publicity of the owner(s) of the Submission and any third party named in it with respect to the Submission and all of its contents, including any names that appear as words within the image and any editing that has been done to the image.

You shall be deemed to have granted Citadel a royalty-free, non-exclusive, transferable, sub-licensable, perpetual license to cache, copy, distribute, transmit, publicly display, publicly perform, reproduce, revise, and otherwise use the Submissions on Citadel's website, and in any other media, digital or analog, now known or hereafter invented, including, but not limited to, the internet, television programs, DVDs, mobile devices, outdoor media, and in advertising or promotion, print or otherwise; provided that any reproduction, revision or other uses that Citadel may make of the Submissions shall be consistent with and in furtherance of our mission.

Citadel will have no obligation to pay you any compensation with respect to its use or nonuse of your Submissions, and is under no obligation to post or use any Submissions you may provide. Citadel may remove any Submission at any time in its sole discretion. You may request the removal of your Submissions for any reason via written notice to Citadel, upon receipt of which Citadel will take reasonable steps to comply.

**Ensuring Accurate Information**

Keeping your account information accurate and up-to-date is very important. If your account information is incomplete, inaccurate, or not current, please use the Contact Us option on the Website or 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.

**Mobile Applications**

Citadel Mobile Applications allow you to access your account balances and holdings, make deposits and transfers, and pay bills from your mobile device. This policy applies to any Personal Information or Other Information that we may collect through those applications.

**Updates to this Online Privacy and Security Policy**

From time to time, we may change this policy. The effective date of this policy, as indicated above, reflects the last time this policy was revised. Any changes to this policy will become effective when we post the revised policy on the Website. Your use of the Website following these changes means that you accept the revised Policy.

**National Consumer Credit Reporting Agencies**

If you would like your name removed from lists for pre-approved offers of credit or insurance obtained from the major credit reporting agencies, go to [optoutprescreen.com](http://optoutprescreen.com) or call 1-888-5OPTOUT (567-8688). The information you provide is confidential and will only be used to process your request.

**National Do Not Call Registry**

Help eliminate unwanted and uninvited calls from telemarketers to your home when you register your telephone numbers – at no cost – with the National Do Not Call Registry. Register your residential and cell phone numbers online at [donotcall.gov](http://donotcall.gov) or by calling 1-888-382-1222. While this will stop most calls, you may still receive calls from businesses with which you have a business relationship.