



### Introduction and Scope of Policy

This Digital Privacy Policy (“Policy”) describes how information is collected by and through websites, mobile applications, and other digital interfaces or platforms (“Sites”) that are owned, operated, or controlled by Greenville Federal Credit Union, 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 Policy.

For purposes of this Policy, the terms “we”, “us”, and “our” refer to Greenville Federal Credit Union that owns, operates, or controls the Sites 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.

### Additional Policies and Notices

This Policy supplements, but does not replace, and should be read in conjunction with the Greenville Federal Credit Union’s 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 and applicable related regulations, the Greenville Federal Credit Union Privacy Notice will apply and control in the event of a conflict with the terms of this Policy, subject to the requirements and provisions of applicable law.

We are not responsible or liable to you for any errors or failures resulting from defects in or malfunction of your equipment, software, or services, nor are we responsible or liable to you for any virus, service malfunction, equipment failure, or related problems that may be associated with the use of our Sites.

At times, Greenville Federal Credit Union Sites may be unavailable due to maintenance or circumstances beyond our control. We strive to maintain active Sites and will continuously work with our service providers to maintain active Sites and restore services as quickly as possible if a Site is unavailable.

### 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 for identity verification, fraud avoidance, and security purposes) or internet browser, information obtained from cookies, 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 our Sites. We may supplement the information we collect from you with information we receive about you from other sources.

### How We Collect, Use, and Share Personal Information

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, applications, and online fields, or you may authorize us to collect personal information from third-party sources. We may also collect information from you indirectly through your acceptance of cookies, and the identification of the device you are using to access the Site, your IP Address, and the geolocation information transmitted by your device. 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 information to you, such as 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 requests, 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 to 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, purposes such as data analysis, audits, fraud monitoring and prevention, new product development, enhancing, improving, or modifying our products and services, identifying usage trends, determining the effectiveness of our promotional campaigns, and operating and expanding our business activities
- As we believe to be necessary or appropriate under applicable law, to comply with legal process and otherwise to comply with applicable laws, rules, and regulations, to respond to lawful requests from public and government authorities, to enforce our terms and conditions, to protect our operations, to protect our rights, privacy, safety or property, and/or that of you or others, and to allow us to pursue available remedies or limit the damages that we may sustain

We do obtain some information that you do not provide us directly. We may collect this information:

- 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 in order to, among other functions, track the actions of users, 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 Policy (including using and sharing such information with our service providers to send 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.

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 the Greenville Federal Credit Union Privacy Notice.

### **Updating Personal Information**

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 information. You may also contact your local branch, or call us at 1.800.336.6309, for information about how to review and update certain information about you in our records.

### **How 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 that 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 piece of data stored on your device that is assigned by a web server to the browser on your device. When you return to a site you have visited before, your browser gives this data back to the server. Mobile applications may also use cookies.

Cookies can be used for various purposes, including but not limited to, collecting information about your web browsing, gathering data about how you use our Sites, providing promotional and reward programs to you, and anti-fraud and information security purposes. Our Sites do not require users to accept cookies, and you can set your browser to notify you when you receive a cookie, allowing you 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.

## **Use of Information for Advertising**

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 across third-party websites and online services. We may also 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 Sites. We may use personal information collected for user behavior tracking and analysis and retargeting campaigns. 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." 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. You may opt out of the rewards programs we offer and the targeted advertising and promotions that are associated with the programs. Please see the terms of the applicable rewards program for information about opting out.

## **Social Media**

We may from time to time use social media websites and applications 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 Policy. If we disclose any terms of use on 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.

## **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.

## **Security**

Greenville Federal Credit Union maintains information standards and procedures that include physical and electronic safeguards, to protect personal information collected through our Sites. We respect the personal and financial privacy of all our members. We are committed to protecting the information on and within our Sites with the same safety and confidentiality standards utilized in the transaction of all Greenville Federal Credit Union business. 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: to conduct business with you; as needed for the purposes outlined in this Policy or at the time of collection; or as necessary to comply with our legal obligations, resolve disputes, and enforce any agreements. For more information, please review the Greenville Federal Credit Union 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.

## **Links to Other Websites**

The information and disclosures contained in this Policy 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 Policy.

## **Specifics to the "Card Manager Greenville FCU" Mobile App Policy**

Greenville Federal Credit Union does not use geolocation, or any location data linked to you or your device when using the Card Manager Greenville FCU mobile app.

## **Changes to this Policy**

We may change our privacy practices and amend this Policy 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 to you. You agree to review the Policy periodically to ensure that you are familiar with the current terms of this Policy. If our changes or amendments to this Policy are material, we will notify you in accordance with applicable law.

## **Questions about this Policy**

If you have questions about this Policy, please call us at 1.800.336.6309 or visit our Contact Us page for more information.