

SECU Online Privacy Policy

Effective date: January 1, 2023

This Online Privacy Policy (the “Policy”) explains how State Employees’ Credit Union (“SECU,” “us,” “our,” or “we”) collects, uses, and discloses your personal information when you interact with any websites and mobile applications (both public and member-only) we operate that include a link to this Policy. The term “Online Services” refers collectively to our member-only websites (Member Access and Mobile Access) and our mobile application. In this Policy, the term “Sites” refers collectively to Online Services and our public websites that include a link to this Policy.

This Policy describes how we use and disclose personal information we receive in connection with your use of the Sites. If you are an SECU member, or are otherwise an individual who obtains or has obtained a financial product or service from us to be used primarily for personal, family, or household purposes, our [Consumer Privacy Notice](#) provides additional information about how we use and share personal information that we collect in connection with the provision of those financial products or services. If you are a California resident, our [California Notice at Collection and Privacy Disclosure](#) includes additional information that we provide pursuant to the California Consumer Privacy Act of 2018, as amended from time to time.

Information We Collect and Receive

When you use or access the Sites, we may collect or receive information about you. The information makes it possible for us to provide you with the full benefits of our Sites, and the types of personal information we collect depend on the product or services you use. The information may include the following:

- **Contact Information**: Contact information such as your name, email address, phone numbers, and mailing address.
- **Account Information and Services**: We offer a variety of services to our members through Online Services, including mobile check deposit, funds transfer, BillPay, account alerts, and other account management functions. If you sign in to Online Services through any available platform, we may collect information such as your account access and security credentials including User ID, account number, password, security questions and answers, email address and telephone numbers.
- **Application Information**: If you use Online Services to open an account with us, we collect information necessary to facilitate your application, which may include your contact information, physical address, Social Security number, date of birth, identification information, citizenship status, and employment information.
- **Location Information**: The general location of the device you use to access Online Services, as derived from your IP address. In addition, if you choose to enable location services through our mobile application, or to share your location with us when you use any of our websites, we will receive your precise, real-time location data. We will use that information to assist you in locating SECU branches and ATM locations near you. Such communications are based on your device and/or browser permissions and may take the form of push notifications, in-app banners, or other real-time notifications.

- Employment Information: If you use the Sites to seek employment with SECU, we may collect professional and employment related information, such as your resume, employment history, certain non-public information such as your Social Security number or characteristics of protected classifications under state or federal law, and any other information you choose to provide in your employment inquiries or applications.
- Other: Any other information you choose to provide to us, such as when sending us secure messages through Member Access.

Information About Others

In some circumstances, we may ask you to provide information about other individuals in order to support the services you have requested. For example, when you use online BillPay we may need information about your intended payee in order to process payments. Similarly, when you designate authorized users which grants them access to your account, we may ask for information about the authorized user. This may include collecting a name, telephone number, email address, or account number. You should not provide us with information about other individuals without their permission.

Information We Collect Automatically

We also may collect certain other information automatically when you interact with the Sites, such as the following:

- Browser and Device Information: This may include device identifiers such as Internet Protocol (IP) address, Media Access Control (MAC) address, unique device identifier information, type of mobile device used, operating system and browser type, the date and time of your visit and other information about your sessions on Online Services.
- Search Engine and Other Referrals: When a third party refers you to one of our Sites, such as clicking on a link to our page from a Google search, or clicking on an online ad for our services, we will receive some information about your device and your interaction with the referring site or content.
- Log Data and Activity Reporting: We may receive log information related to your activities while using the Sites, including text search queries and voice queries. We may also use various technologies such as cookies, pixel tags, and web beacons for security purposes and to learn more about how visitors use the Sites. These technologies allow us to collect information such as browser type, time spent on the Sites, pages visited, referring URL, and other traffic and usage data. They may also be used to determine what features interest our visitors, or to revise site features. In some cases, these technologies are provided by third parties with whom we work. For example, we use Google Analytics in connection with the Sites. Google Analytics uses cookies to help us analyze how visitors use the Sites. The information generated by the cookies about your use of the Site includes your IP address. If you so choose, you may be able to opt out of the collection of your information by Google Analytics by turning off cookies in the preferences settings in your browser. For more information on Google Analytics, including how Google Analytics collects, uses, and discloses information, refer to the following page: <https://policies.google.com/technologies/partner-sites>.

- Location Information. We may receive your approximate location or data that indicates your approximate location, such as your IP address. If you choose to enable location tracking on our mobile application, or share your location with us when you use any of our Sites, we may also obtain and collect more precise geolocation information.

Information We Collect from Third-Party Sources

We may also collect information about you, including personal information and information that is not personally identifiable to you, from third-party sources including, but not limited to, credit bureaus, our affiliates, or other entities.

How We Use Your Information

We may use personal information that we collect for purposes that include the following:

- Providing access to our products and services through Online Services and responding to inquiries you submit through Online Services.
- Managing our business, including performing accounting, auditing, and other internal functions.
- Maintaining your accounts.
- Verifying your identity and authenticating you (such as when you request access to your account information).
- Communicating with you and others, including about transaction, account-specific and/or general notification matters and alerts, special offers, ads, events, or new products or services that may be of interest to you.
- Personalizing and tailoring Online Services and otherwise enhancing the member experience.
- Developing, operating, improving, delivering, maintaining, and protecting Online Services, including webforms.
- Supporting our employment, human resource management, and employee benefits functions.
- Enhancing the safety and security of our products and services.
- Protecting the legal rights, property, safety, and security of records or information, our organization, Online Services users, our other members, and others, including detecting and preventing fraud, misuse of Online Services, and other unauthorized activity.
- Engaging in institutional risk control and resolving member disputes.
- Complying with industry standards, laws and regulations, court orders, legal investigations, contractual obligations, and our own internal policies.
- Enforcing our policies, terms of use, or rights arising from contracts.
- For other purposes as permitted by law or as you may authorize.

We also may aggregate or de-identify your personal information by removing any details that identify you personally. We will use aggregated or de-identified information to the extent permissible under applicable law.

Disclosure of Your Information

We may disclose personal information we collect about you through Online Services:

- To our affiliates or business partners, such as other financial institutions with which we jointly market (e.g., to bring you co-branded services or products).
- To our contractors, service providers, and other third parties we use to support our organization.
- To communicate with you and others, including persons who hold a legal or beneficial interest relating to you or persons acting in a fiduciary or representative capacity on your behalf.
- To report to credit bureaus and other similar organizations in order to evaluate your eligibility for products or services.
- To maintain your accounts.
- For our recruitment and hiring purposes, including evaluating and processing your employment application.
- To insurance rate advisory organizations, guaranty funds or agencies, agencies that are rating us, persons that are assessing our compliance with law or industry standards, and attorneys, accountants, and auditors.
- To debug, identify and repair errors, or effectuate similar functional enhancements in connection with our Sites.
- To protect against malicious, deceptive, fraudulent, or illegal activity, and participating in any prosecution or enforcement of laws or agreements meant to prevent or punish such activity.
- To protect the legal rights, property, safety, and security of us, our users, our employees, and others.
- To comply with applicable law, other legal requirements, and industry standards.
- To enforce our policies, terms of use, contracts, or other legal rights.
- To respond to emergencies.
- To other parties as you may authorize or permit.

Additionally, if SECU is involved in any merger, acquisition, sale of organization assets, transition of service to another provider, or insolvency, bankruptcy, or receivership, SECU reserves the right to transfer your collected information (including personal information) in connection with such transaction.

If you are an SECU member, or are otherwise an individual who obtains or has obtained a financial product or service from us to be used primarily for personal, family, or household purposes, our [Consumer Privacy Notice](#) provides additional information regarding our sharing of the personal information we collect in connection with our provision of those products and services.

Your Choices

You may choose not to provide personal information that we request. However, not providing information requested may restrict your ability to use certain features of the Sites. For example, you may be able to restrict the collection of personal information or functionality through your device's operating system or by disabling cookies, but doing so may prevent you from using the functionality of the Sites.

Some Internet browsers have a "Do Not Track" feature that lets you tell websites that you do not want to have your online activities tracked. At this time, the Sites do not respond to browser "do-not-track"

signals. Other parties may collect personal information about your online activities over time and across different websites when you use the Sites.

Third-Party Links

The Sites may contain links to relevant external websites and information controlled or offered by third parties. SECU is not responsible for the content or privacy practices of websites owned by other entities. We recommend that you carefully review the privacy notice for each of the websites you visit because SECU has no control over the privacy practices or content of these linked sites.

Children's Privacy

The Sites, as defined above, are not directed towards children under the age of 13. We do not seek to collect, nor do we knowingly collect, information from children who are under age 13 through the Sites.

Changes to this Policy

We may update this Policy to reflect changes in our privacy practices at any time and without prior notice to you. When we do so, we will update the Effective Date of the Policy. We encourage you to periodically review this Policy for the latest information on our privacy practices.

Contacting Us

If you have any questions or comments about this Policy or our privacy practices, please contact our 24/7 Member Services by phone at (888) 732-8562, or by email at info@ncsecu.org.