

## General Data Protection Notice

This Notice describes how United Federal Credit Union (“UFCU”, “we”, “our”, “us”) collects, uses and shares the personal information we process when such information falls within the material and territorial scope of the General Data Protection Regulation (“GDPR”). The terms outlined in this Notice are in addition to UFCU’s standard Privacy Policy. Where terms between this Notice and our standard Policy conflict, the terms contained in this Notice will govern. This Notice also describes the choices available to those whose personal information falls within the scope of this Notice (“you”, “your”). Our provision of this Notice or any other act regarding your information is not a consent or acknowledgment of the applicability of the GDPR to us. Rather, we have voluntarily determined to provide you with the information and rights outlined in this Notice.

### How your information will be used

1. UFCU gathers certain types of personal information about our website and mobile app users, our members, and our account applicants. The information UFCU holds and processes is used for management, administrative, and marketing purposes. We keep and use the data to enable us to run the business, fulfill certain regulatory requirements, manage your accounts, offer you products and services, and manage our relationship with you effectively, lawfully and appropriately. This includes using information to enable us to comply with United States federal and state laws, and our membership, service and account agreements as applicable. The information we process also enables UFCU to provide certain website, mobile, and banking services such as Online Banking and account application processing. If you do not provide this data, we may be unable to offer you these services.
2. Occasionally we may need to process your personal data to pursue our legitimate interests, for example to prevent fraud, for administrative purposes, or for reporting potential crimes.
3. Much of the information we hold will have been provided by you, but some information may come from other sources, such as Google Analytics and other related and/or similar services.
4. Below are broad categories of the types of personal data we collect with examples:
  - a. Identification data: Legal names, pseudonyms, usernames, Social Security numbers, driver’s license numbers, and passport numbers;
  - b. Location and contact data: Addresses, phone numbers, email addresses, geo-tracking, and IP Address;
  - c. Personal data: Birth dates, marital status, UFCU passwords, age, photographic images, personal history, and gender;
  - d. Financial data: Bank accounts numbers and transaction information, personal and real property records, title information, and tax records.
5. We use cookies to personalize content and ads, provide social media features and analyze our website traffic. We also share information about your use of our site with our social media, advertising, and analytics partners. This information may be combined with other information that you have provided to our partners or that they have collected from your use of their

services. This site includes social media features, such as Facebook, Twitter, and LinkedIn “share” buttons. These features may collect your IP address and may set a cookie to enable the feature to function properly. Your interactions with these features are governed by the privacy policy of the third party providing such sharing services.

6. Where we process special categories of information relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, biometric data or sexual orientation, we will always obtain your explicit consent to those activities unless your consent is not required by law. Where we are processing data based on your consent, you have the right to withdraw that consent at any time.
7. Other than as mentioned elsewhere in this policy, we will only disclose information about you to third parties if we are legally obliged to do so or where we need to comply with our contractual duties to you.
8. We engage service providers to perform certain functions and services for our Members. For instance, we use a third party service provider to process CardPerks™ Rewards redemption requests. We may share your personal data with such service providers subject to the obligations within this Notice and on the condition that the third parties use your private personal data only on our behalf and pursuant to our instructions.
9. We use automated decision making (including profiling) in limited circumstances, including in evaluating account applications. Such decision making will be based on applicant creditworthiness as determined by the applicant’s credit history and financial status.
10. The criteria used to determine the period of storage of personal data is the related statutory retention period. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfillment of the contract, the initiation of a contract, or retained with your consent.
11. If in the future we intend to process your personal data for a purpose other than that for which it was collected, we will provide you with information on that purpose and any other relevant information.

### **Your rights**

12. Under this Notice, you have a number of rights with regard to your personal data. You have the right to:
  - a. Request access to personal data;
  - b. Rectification of personal data held where it is incorrect or incomplete;
  - c. Erasure of your personal data if certain grounds are met;
  - d. Restrict/suspend processing of personal data;
  - e. Complain to a supervisory authority; and

- f. In certain circumstances, you have the right to:
  - i. Data portability (if processing is based on consent or contract and processing is automated);
  - ii. Withdraw consent at any time (if processing is based on consent);
  - iii. Object to processing (if processing is based on legitimate interests);
  - iv. Object to processing of personal data for direct marketing purposes.
- 13. You have the right to lodge a complaint to the Information Commissioners' Offices if you believe that we have not complied with the requirements of the GDPR with regard to your personal data. UFCU is the controller and processor of data.
- 14. If you have any concerns as to how your data is processed, you can contact a representative from our Member Service Center at (888) 982-1400 or (269) 982-1400, 8:00 am to 10:00 pm ET, Monday through Friday and 8:00 am to 4:00 pm ET on Saturday.