# **Digital Banking Privacy Policy**

## **Abilene Teachers Federal Credit Union**

At Abilene Teachers Federal Credit Union (ATFCU), we put our members first and take pride in offering a variety of financial services. Protecting your privacy, along with your financial assets, is central to our mission. Whether you are an existing member or are considering membership with us, we understand how important it is for you to know how we collect, retain and use information about you. We recognize that you have a right to expect your personal financial information to remain private and secure. Abilene Teachers Federal Credit Union maintains standards to ensure that your information is private and secure at all times.

Abilene Teachers Federal Credit Union's Digital Banking Privacy Policy appears below. It is our commitment to protect your personal information in accordance with this policy.

### Use, Collection, and Retention of Member Information

Abilene Teachers Federal Credit Union collects, retains, and uses information about members only where reasonably necessary – and allowed by law – to administer our business and to provide products, services, and other opportunities that we believe will benefit our members.

When you visit our website, we may collect and retain the following information:

- 1. your IP address,
- 2. the domain name from which you access the Internet (e.g., google.com, att.net),
- 3. the date and time you access our site,
- 4. the type of computer you are using,
- 5. the type of web browser you are using, and
- 6. the Internet address of the website from which you directly linked to our site, if applicable.

When you use our mobile app, we may collect and retain the following information:

- 1. your IP address,
- 2. the domain name from which you access the Internet (e.g., google.com, att.net),
- 3. the date and time that you use the app
- 4. the type of device you are using
- 5. the browser you are using, and
- 6. location data to enable the geolocator feature. If you have 'background information' turned on, the ATFCU app will, from time to time, tell us about your device's location even if you are not directly interacting with the application.

We use this information to measure the number of members using our digital offerings and in order to make them more useful to you. If you identify yourself by inputting personal information we will use that information only to respond to your inquiry or request. We will not share any such information to any third party unless required by law.

#### **Collection of Information from Children**

The Credit Union does not permit children less than 13 years of age to submit personal information to us online, and we do not knowingly collect personal information online from children under 13.

#### Maintenance of Accurate Information

The Credit Union has established procedures to ensure that the personal information you submit to us is accurate, current, and complete at all times in accordance with reasonable commercial standards. If you should find that your information is incorrect, email, call or write to us at the following telephone numbers or addresses.

atfcu@abileneteachersfcu.org 325-677-2274 or 800-677-6770

Abilene Teachers Federal Credit Union P.O. Box 5706 Abilene, TX 79608

We will respond to requests to correct inaccurate information in a timely manner.

### **Limiting Employee Access to Information**

The Credit Union limits employee access to personally identifiable member information to those employees with a valid business reason for knowing such information. We train our employees on the importance of confidentiality and privacy and require each of our employees to comply with this policy, our procedures, and our standards of conduct.

# **Protection of Information by Way of Established Security Procedures**

All the Credit Union's operational and data processing systems are in a secure environment that protects your account information from being accessed by third parties. In addition, we maintain appropriate security standards and procedures to prevent unauthorized access of all other Credit Union information. By way of example, our internet banking system uses a cryptographic (digital certificate) key to secure account information sent between our server and your browser. This communication key allows us to encrypt data sent through the Internet. Our server also employs sophisticated firewalls to prevent unauthorized access to Credit Union and member information.

### **Restriction on Disclosure of Account Information**

Abilene Teachers Federal Credit Union does not share member information with nonaffiliated third parties for independent use, except:

- 1. For the exchange of information with reputable reporting agencies in order to maximize the accuracy and security of such information,
- 2. In connection with providing certain products or services that we believe may benefit our members.

We do not sell our members' information to anyone. We place strict limits on companies to whom we provide personally identifiable data for marketing purposes. Whenever we provide information for this purpose, we carefully review the company and the product or service to ensure that it provides value to our members. In addition, we share only the minimum amount of information necessary for that company to offer its product or service to you.

In addition to the foregoing, the Credit Union will also provide member information to nonaffiliated third parties in the following circumstances:

- 1. In order to complete a transaction initiated by one of our members
- 2. If a member requests it,

- 3. In order to enforce an agreement we have with a member,
- 4. If the information disclosure is required by law.

### **Maintaining Member Privacy in Business Relationships with Third Parties**

When the Credit Union provides member information to a nonaffiliated third party we require, by way of a written agreement, that the third party adhere to privacy principles and standard of conduct consistent with those to which the Credit Union adheres for keeping member information confidential. We also ensure that the third party has adequate policies, procedures and appropriate measures in place to meet its obligation to safeguard your information.

#### **Website Cookies**

To provide better service and a more effective website, the Credit Union may use "cookies" as part of our interaction with your Internet browser. A "cookie" is a small test file placed on your hard drive by our web page server. A cookie cannot retrieve any other data from your hard drive, pass on computer viruses, or capture you email address. Cookies are commonly used on websites and do not harm your computer system. We may use cookies in places where you may need to register, such as internet banking, or where you are able to customize the information you see. Recording a cookie at such points makes your online experience easier and more personalized. We may also use cookies to identify what sections of our site members visit most often so we can continue to provide information on the products and services in which our members have demonstrated an interest. These cookies do not collect personally identifiable information and we do not combine information collected though cookies with other personal information to determine who you are or your email address. By configuring your preferences or options in your Internet browser, you can control if and how a cookie will be accepted.

# **Updates and Changes for Digital Banking Privacy Policy**

The Credit Union reserves the right, at any time and without notice, to add to, change, update or modify this policy, simply by posting such change, update, or modification on our website. Any such change, update, or modification will be effective immediately upon posting on our website.

### **More Information**

Abilene Teachers Federal Credit Union values its members and their privacy. We want you to understand how we use the information you provide and our commitment to ensuring your personal privacy. If you have any questions about how the Credit Union protects or uses your confidential information, please contact us at the telephone number or address shown above.