

Allegacy Federal Credit Union Digital Privacy Policy

This Digital Privacy Policy (“Policy”) explains how Allegacy Federal Credit Union (“Allegacy”, “us,” “our,” or “we”) collects, uses, discloses, and protects personal information that we collect from you through our websites <https://www.allegacy.org/> and the Allegacy Mobile Banking app (collectively, the “Services”). Please read this notice carefully to understand how we handle user privacy.

Although this Policy generally describes how we use and disclose personal information in connection with Services, the [Allegacy Privacy Disclosure](#) will apply to financial Services, such as loan or credit card applications, and all Services available to our members, such as online or mobile banking.

Information We Collect and Receive

When you use or access the Services, we may collect or receive personal information. The types of personal information we collect depend on the product or service you use. This information may include the following:

Information about you: You may provide us with information about you when you use the Services. This information may include the following:

- ***Contact Information:*** Contact information, such as your name, email address, or phone number, such as when you schedule an appointment or send us a message.
- ***Application Information:*** We collect information necessary for you to use our products and services, including to apply for membership, to open an account, or to apply for a loan or credit card. The information we collect may include your contact information, physical address, social security number, date of birth, identification information, citizenship status, and employment information.
- ***Banking and Investment:*** For members, we offer a variety of functionality through the Services, including mobile check deposit, fund transfer, bill payment, and other account management. If you log in to our WebBanking portal, you may provide us with information such as your contact information and your access credentials, to engage in features such as Bill Pay, direct payment services to send funds to your contacts, or activate shared access for other authorized individuals to use features of your account (subusers).
- ***Location Services:*** If you choose to enable location services through our mobile application or mobile websites, we will receive your precise, real-time location data. We will use that information to assist you in finding nearby locations (for example, to locate ATMs or schedule appointments near you). We also may use it to send you relevant promotions and content (for example, to send you messages regarding our products and services or to provide you with informational notices such as holiday closings or lobby hour changes). Such communications are based on your device permissions and may take the form of push notifications, in-app banners, or other real-time notifications.

- *Voice Banking:* If you choose to enable Voice Banking Assistant, we will receive information submitted by or through your hands-free devices, such as Amazon Echo, Google Home, or similar devices, to fulfill your voice inquiries or directions, such as requests for account balances or recent transaction history.
- *Job Applications:* We collect information when you request that we notify you about our employment openings or when you apply for a job. The information we collect may include your contact information and information about your education and employment history.
- *Other:* Any other information you choose to provide when you contact us or otherwise engage with us through the Services, including information you type into our chat features.

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 Bill Pay or direct payment services, we will need information about your intended recipient in order to transfer funds. Similarly, when you activate shared access for other authorized users of your account, we may ask for information of others to facilitate the service you have requested. This may include collecting a name, telephone number, email address, or account number. In such cases, the [Allegacy Privacy Disclosure](#) applies. 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 engage with the Services, such as:

- *Browser and Device Information:* Certain information is automatically collected by most websites, such as information about your device and your browser. For example, we may receive device identifiers such as IP address and MAC address, operating system type and version, and Internet browser type and version.
- *Search engine and other referrals:* When a third party refers you to our Services, 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.
- *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 your mobile application, we collect your geolocation information in the background or when the app may not be in use.
- *Activity Reporting and Log Data:* We may receive log information related to your activities while using the Services, such as text search queries or voice queries submitted through Voice Banking Assistant. In addition, Google Analytics uses cookies to help us analyze how visitors use the Services. The information generated by the cookies about your use of the Services includes your IP address. If you so choose, you may be able to opt out 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>.

How We Use and Share Personal Information

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

- Providing the Services and supporting the features available to you.
- Delivering products and services including verifying your identity, supporting your applications for financing or accounts, carrying out transactions, and administering benefits.
- Personalizing your digital and mobile experience with us, such as enhancing features and designing relevant alerts, products, or services.
- Understanding how you and our clients use our Services and to determine what features and services may interest you and our clients.
- Operating and improving our organization and our services.
- To communicate with you and others, including responding to requests and providing promotional content.
- Trouble-shooting, de-bugging, and otherwise addressing issues that may arise with the functionality of the Services.
- Protecting the legal rights, property, safety, and security of records or information, our organization, our members and Service users, and others, including detecting and preventing fraud, misuse of the Services, and other unauthorized activity.
- To engage in institutional risk control or resolve consumer disputes.
- Complying with industry standards, applicable law, judicial process, any properly authorized civil, criminal, or regulatory investigation, or any subpoena or summons issued by a competent authority.
- Enforcing our policies, terms of use, or rights arising from contracts.
- For such purposes as you may authorize at the time you submit the information.

We also may aggregate or de-identify personal information by removing any details that identify you personally. Aggregated or de-identified information will not be subject to this Policy and will be used to the extent permissible under applicable law.

We may disclose personal information in order to achieve these purposes. We may disclose personal information:

- To our affiliates or business partners, such as other financial institutions with which we jointly market.
- To our contractors, service providers, and other third parties we use to support our organization and the Services.
- To persons holding a legal or beneficial interest relating to you or to persons acting in a fiduciary or representative capacity on your behalf.
- 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 government agencies or others as necessary to comply with any court order,

law, or legal process, including to respond to any government or regulatory request, and consistent with other purposes authorized by law.

- To consumer reporting agencies and similar organizations in order to evaluate eligibility for products or services.
- To other organizations, such as a buyer or other successor in interest, in the event of an actual or potential merger, divestiture, restructuring, reorganization, dissolution, or other sale, exchange, or transfer of some or all of our assets, including as part of bankruptcy, liquidation, or similar proceeding.

We also will disclose information for any purpose or to any organization that you authorize or permit, such as when we request your consent to share your information and you agree.

Your Choices

We respect your privacy and offer choices regarding our collection and use of your personal information.

- You may choose not to provide the personal information we request. However, not providing information we request may restrict your ability to use certain features of the Services. For example, we will not be able to provide you with most of the features available through our Services if you do not register as a member.
- You may opt out of location services through our mobile app and mobile website by changing your device settings to prohibit location tracking, or blocking our app from collecting your location data.
- You may opt out of our push notice using your device settings.
- You may opt out of promotional emails and text messages using the opt-out mechanism provided with those messages.
- 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 Services. Some Internet browsers have a "do-not-track" feature that let you tell websites that you do not want to have your online activities tracked. At this time the Services do not respond to browser "do not track" signals. We may allow third parties to use the Services to collect personal information about your online activities over time and across different websites, applications, and other online products or services.

Security

We maintain safeguards intended to protect the personal information collected through the Services. We use reasonable security measures, including physical, administrative, and technical safeguards to protect your personal information. The security of your personal information also depends on you. You should keep your access credential confidential and make sure your devices and software are up-to-date to ensure the latest security measures are installed.

Links to Other Websites and Services

We may provide links to other websites and services for your convenience. Examples include HealthLink, Financial Pathways of the Piedmont, and our investment newsletter. Those sites and services are not subject to this Policy. The operators of linked websites and services may have posted their own privacy policies that you should review to learn more about their privacy practices.

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, above. 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 us by calling 336-774-3400 or 800-782-4670 or go to www.allegacy.org.