

## ONLINE PRIVACY AND COOKIE NOTICE

This Online Privacy and Cookie Notice (“Online Privacy Notice”) describes IDB Global Federal Credit Union’s (“IDBG FCU”) online and mobile privacy practices and applies to websites, mobile applications that run on smartphones, tablets, and other devices (“apps”), and additional services that we offer which link to this Online Privacy Notice. IDBG FCU respects your privacy and commits to complying with our policies in order to protect your privacy.

Information you provided IDBG FCU when you applied for or obtained a financial product or service from us is also governed by our federal Privacy Policy. If you are such an applicant or customer, please refer to that notice for additional information about our privacy practices.

By using this website or our apps, you agree to the terms and conditions of this Online Privacy Notice.

### Information We Collect – and How We Collect It

Our websites and apps are not intended to be used by children. We do not knowingly collect personal information from children under 13 without permission from their parent or legal guardians. No one under age 13 may provide any personal information to the Website. If you are under 13, do not use or provide any information on this Website or through any of its features, register on the Website, make any purchases through the Website, use any of the interactive or public comment features of this Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at [cu.marketing@idbglobalfcu.org](mailto:cu.marketing@idbglobalfcu.org). For more information about the Children's Online Privacy Protection Act (COPPA), please refer to the FTC's website at <https://www.ftc.gov/tips-advice/business-center/privacy-and-security/children's-privacy>.

When you use our website or our apps, we may collect Personal Information that you submit to us voluntarily, or Online Activity Data that we collect passively.

**Personal Information** is information such as your name, mailing address, email address, telephone number, Social Security number, or other information that identifies you. This information may be collected when you voluntarily provide it to us through forms on our website or in our apps. These forms could include applications, information temporarily saved in form fields, and sign in pages for loan application access.

**Online Activity Data** includes information such as your IP address, browser type, and display/screen settings; how you interact with our website and apps; mobile device and advertising IDs; social media preferences and other social media data; and other data that may be aggregated and that doesn't identify individual consumers/customers. This data may be collected using cookies and other online tracking devices such as web beacons, depending on your browser settings. Cookies are small pieces of data sent from a website and stored on your computer by your web browser that can allow other websites that you visit to track your browsing activities. A web beacon is a small string of HTML code that represents a graphic image on a website or email. IDBG FCU may also partner with third parties to monitor activities on our own website and other websites. These partners may use cookies, web beacons, and/or other monitoring technologies to compile statistics about website visitors. Additionally, IDBG FCU may collect Online Activity Data when you use our apps or your mobile device browser to access our website, i.e., geolocation data (if you have enabled location services on your device). IDBG FCU may also collect Online Activity Data or information such as your likes, interests, feedback, and preferences when you interact with our official pages on social media websites such as Facebook, Twitter, LinkedIn, YouTube, and Instagram or from our social media partners (but only if you choose to share with them and they, in turn, share that information with us). Please refer to the policies of those companies to better understand your rights and obligations with regard to your activity on those websites.

### How We Use Information

We may disclose aggregated and de-identified information about our users, and information that does not identify any individual, without restriction.

We may use Personal Information and Online Activity Data we have collected for a variety of reasons, including:

- to present our website and its contents to you;
- to enable you to use online tools or perform certain online transactions;
- to service and manage your account, including responding to or updating you on inquiries, or to contact you about your accounts or feedback;
- to offer you special products and services and deliver advertisements to you in the form of banner ads, interstitial pages (ads that appear as you sign in or sign out of your online accounts) or other promotions;
- to analyze whether our ads, promotions, and offers are effective;
- to help us determine whether you might be interested in new products or services, and to improve existing products and services;
- to verify your identity and/or location to allow access to your accounts, and conduct online transactions

- to manage fraud and data security risk;
- to personalize and optimize your website browsing and app experiences by examining which parts of our website you visit or which aspect of our apps you find most useful;
- to comply with federal, state or local laws; civil, criminal or regulatory investigations; or other legal requirements;
- to share with trusted third parties who are contractually obligated to keep such information confidential; and
- to use it only to provide the services we have asked them to perform. For a description of how IDBG FCU may share information collected from consumers who have applied for or obtained a consumer product or service from us, please refer to our federal Privacy Policy.

## Who We Share Your Information With

We disclose your Personal Information and Online Activity Data to third-parties for our business purposes. The general categories of third-parties that we share with are as follows:

1. Our third-party service providers;
2. Our affiliated websites and businesses in an effort to bring you improved service across our family of products and services, when permissible under relevant laws and regulations;
3. Other companies to bring you co-branded services, products or programs;
4. Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you;
5. Third parties or affiliates in connection with a corporate transaction, such as a sale, consolidation or merger of our financial institution or affiliated business; and
6. Other third parties to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights, or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third parties.

## Use of Cookies and Similar Tracking Technologies

This part of our Online Privacy Notice explains how IDBG FCU may use cookies and similar tracking technologies when you interact with us online or through our websites and mobile applications (“sites and mobile apps”).

### *Introduction*

The use of cookies and similar tracking technologies (including pixels or clear GIFs, tags, web beacons and Flash objects) is a common internet practice. Cookies are text files containing small amounts of information which are downloaded to your computer, smartphone, tablet or other mobile device when you visit a website. Tracking technologies may collect information about you and your use of sites and mobile apps. We have developed this policy to provide general information on cookies and similar tracking technologies which we will refer to as “cookies.”

Cookies are useful in a number of ways, including allowing a site or mobile app you use to recognize your device, keep track of pages visited and even remember your preferences. This information is used for security purposes, to facilitate navigation, to display information more effectively and to personalize the user’s experience. Cookies and similar tracking technologies are also used to gather statistical information about how sites and mobile apps are used in order to continually improve design and functionality and assist with resolving questions regarding the sites and mobile apps.

### *Attributes of Cookies*

Cookies set by us are called **first-party cookies**. We may also have **third-party cookies**, which are cookies from a domain different than the domain of the website you are visiting, for our advertising and marketing efforts. There can be first-party and/or third-party cookies within any of the below Categories of Cookies.

Cookies have a duration period. Cookies that expire at the end of a browser session are called “session” cookies. Cookies that are stored longer are called “persistent” cookies. There can be session and/or persistent cookies within any of the below Categories of Cookies.

### *Categories of Cookies*

Below is a list of the types of cookies that may be used in our sites and mobile apps. We classify cookies into the following categories:

**Necessary.** These cookies are necessary for the sites and mobile apps to function and cannot be switched off in our systems. Without these cookies, the sites and mobile apps will not work properly. Examples include setting your privacy preferences, setting your language preferences or logging in a secured area requiring authentication. Strictly necessary cookies may also detect transmission errors or data loss or distribute network traffic across different servers to ensure accessibility. You can set your browser to block or alert you about these cookies, but that will cause some parts of the site to not work.

**Preferences.** Preference cookies enable the sites and mobile apps to remember information that changes the way

that the sites and mobile apps behave or look, like the preferred language or the region that you are in.

**Statistics.** Statistic cookies enable us to measure and improve the performance of our sites and mobile apps. These cookies collect information about how visitors use a site and mobile app, for instance, which pages visitors go to most often and if they get error messages. These cookies can also be used to make collective inferences based on choices and browsing behavior for marketing research.

We use Google Analytics to measure and improve the performance of our site.

To view an overview of the privacy of your Google Analytics cookies please go here: <https://support.google.com/analytics/answer/6004245>.

You may install a Google Analytics opt-out browser add-on by going here: <https://tools.google.com/dlpage/gaoptout?hl=en-GB>.

**Marketing.** Marketing cookies are used to deliver advertisements that may be relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of an advertising campaign. They are usually placed through our sites and mobile apps by our advertising partners and remember that you have visited a site or mobile app. This information may be shared with other organizations such as advertisers.

**Unclassified.** Unclassified cookies are cookies that we are in the process of classifying, together with the providers of individual cookies.

## How to Control and Delete Cookies

### 1. Using Your Browser

Many of the cookies used on our website can be enabled or disabled through our consent tool or by disabling the cookies through your browser. To disable cookies through your browser, follow the instructions usually located within the “Help,” “Tools” or “Edit” menus in your browser. Please note that disabling a cookie or category of cookies does not delete the cookie from your browser unless manually completed through your browser function.

Some browsers may have enabled “do not track” (“DNT”) signals. DNT is a signal, sent from an individual’s browser to a website via standard web protocols, requesting that a website refrain from tracking an individual’s online activities. The World Wide Web Consortium (“W3C”) created a working group to standardize this tool. Despite a decade of effort, the DNT project ended when the W3C disbanded the working group in 2019 due to insufficient support and adoption. Because DNT signals and appropriate responses are undefined, our website does not respond to browser DNT signals.

A growing number of browsers are adopting Global Privacy Control (“GPC”), which was created in 2020 and is similar to DNT. The GPC is a technical specification for transmitting universal opt-out signal that communicates a consumer’s choice to opt-out of the sale or sharing of their personal information for behavioral advertising. Where required to do so under applicable law, our website will honor GPC signals.

### 2. Using Your Mobile Device

Some mobile devices come with a non-permanent advertising identifier or ID which gives companies the ability to serve targeted ads to a specific mobile device. In many cases, you can turn off mobile device ad tracking or you can reset the advertising identifier at any time within your mobile device privacy settings. You may also choose to turn off location tracking on your mobile device. By turning off ad tracking or location tracking on your mobile device, you may still see the same number of ads as before, but they may be less relevant because they will not be based on your interests.

### 3. Behavioral Advertising on Third Party Websites

Online Activity Data collected on our website or apps may be used to advertise IDBG FCU products and services that may be of interest to you on third party websites. Our service providers that deliver these advertisements are subject to their own privacy policies. To explore options for opting out of behavioral advertising, visit <http://optout.aboutads.info/> or click on the AdChoices icon in an ad and follow the instructions. You may also use the Network Advertising Initiative's (NAI) Opt-Out Tool by visiting <https://optout.networkadvertising.org/?c=1>. Furthermore, you may download the Google Analytics opt-out plug in, available at <https://tools.google.com/dlpage/gaoptout/>, to prevent your data from being collected and used by Google Analytics. Moreover, there may be other tools provided by the publishing platform to enable you to opt-out. Opting out relies on information in the unique cookies placed on your web browser by our service providers, so if you delete cookies, use a different device, or change web browsers, you may need to opt out again. Additionally, we may partner with websites like Google and Yahoo to display ads to you based on search terms you use on those websites. Please review the privacy policies of those websites for instructions on how to limit these ads. Please note that you may still receive general online advertising from IDBG FCU even after you adjust your ad preferences with certain web search engines or opt out of online advertising through AdChoices or the NAI tool. Such advertising, however, should not be based on Online Activity Data or search term information.

However, since we do not own or control these third-party resources, we cannot ensure that you will stop receiving our advertisements by using these tools or that such advertisements will not be based on Online Activity Data or search term

information, and we do not guarantee the functionality or availability of such third-party tools. While IDBG FCU works with vendors and service providers who are contractually obligated to comply with our policies to protect information and to comply with all applicable laws regarding the collection, safeguarding, processing and disclosure of personal information, such vendors and service providers are solely responsible for cookies, cookie tracking and your choices for managing cookies.

#### **4. Cookie Consent Tool**

You may also opt-out of cookies by adjusting your cookie preferences through IDBG FCU's Cookie Consent Tool and by confirming your cookies preference choices. Strictly necessary cookies cannot be disabled, nor can the tool be used to block cookies on third party websites linked from our website. Please note that while your opt-out choices may be effective on the specific device and browser you use when you opt-out, it may not be effective on other devices or browsers that you may subsequently use to visit our website, and you may need to use the Consent Tool feature again when visiting our website from such other browsers or devices.

You can access IDBG FCU's Cookie Consent Tool anytime from our website.

#### **Third Party Website Cookies That We Cannot Control**

When using our website, you may be directed to other websites for such activities as surveys, completing job applications, and to view content hosted on those sites such as an embedded video or news article. These websites may use their own cookies. We do not have control over the placement of cookies by other websites you visit, even if you are directed to them from our website.

#### **Updating or Correcting Your Information**

Keeping your account information up to date is important. You may review, correct, or update certain account information by signing into your account online. Note that this right to correct information includes the right to request changes to any of your personally identifiable information that we have collected through our website and online services. If you cannot update or change the incorrect information online, or you prefer to request changes offline, please see the Customer Service section on our website, or call 202-623-3363 or write to us using the contact information listed on your account statements, records, or other account materials.

#### **Links**

Our websites may include links to third-party websites. These third parties are not subject to this Online Privacy Notice. Please review their privacy notices when visiting these websites.

#### **Information Security**

At IDBG FCU, we are committed to protecting your personal and financial information. If we collect identifying information from you, we will protect that information with security measures based on internationally recognized security standards, regulations, and industry-based best practices.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the website like message boards. The information you share in public areas may be viewed by any user of the website.

#### **Changes to this Online Privacy Notice**

IDBG FCU reserves the right to amend or change its online privacy practices in the future and we may revise this Online Privacy Notice at our discretion and at any time. Changes to this Online Privacy Notice will be posted to our website.

## Glossary

**AdChoices:** Allows individuals to opt out of browser-enabled interest-based advertising by some or all participating companies, using opt-out cookies to store your preferences in your browser.

**Browser:** An application used for accessing websites or information on a computer network. Examples include Chrome, Safari, Edge, Internet Explorer, and Firefox.

**Business partners:** Companies we partner with to jointly market and/or deliver products and services to you. Business partners include affinity or co-brand business partners. They may not use this information to independently market to you unless you consent.

**IP address:** A unique "Internet Protocol" number assigned to a device connected to the Internet. IDBG FCU treats IP addresses as non-personal information unless otherwise required by law.

**Operating system:** Software that controls the operation of a computer and directs the processing of programs, such as Microsoft Windows or macOS.

**Service providers:** Vendors with whom we have a contractual relationship to perform services on our behalf.

**Session:** The time from when a customer is signed into a website or app to when the customer is signed out.

**Social media:** Websites and apps that enable users to create and share content or to participate in social networking, such as Facebook, Twitter, LinkedIn, YouTube, and Instagram.

**Third-party websites:** Sites that are not owned or operated by IDBG FCU and are not subject to our Online Privacy Notice.

**Web beacon** (alternatively referred to as a tracking bug, tag, page tag, tracking pixel, pixel tag, or clear gif): An often-transparent graphic image, usually no larger than 1 pixel x 1 pixel, that is placed on a website or in an email that is used to monitor the behavior of the user visiting the website or interacting with the email. Web beacons can be used for activities like site traffic reporting, unique visitor counts, advertising auditing and reporting, and personalization.