

## **Introduction**

This Privacy Policy describes how AMOCO Federal Credit Union ("AMOCO") collects, uses, processes, and shares personal information. This policy applies to visitors and users (individually, "you") of AMOCO's websites, applications, social media accounts, and other services (collectively, our "site(s)"). We value your privacy and the privacy of others who visit and use our sites and want you to be familiar with how we collect, use, and disclose personal information.

AMOCO is a financial institution serving tens of thousands of members. We collect highly confidential personal information to process transactions and make various account decisions, including the approval and issuance of loans and other financial instruments. Additionally, we contract with third-parties to conduct a wide variety of operational tasks for the credit union. These third-parties may collect personal information and use that information to fulfill contractual obligations with us. We take steps to ensure these affiliated third-parties protect your information consistent with this policy. This policy does not otherwise cover the use of personal information by nonaffiliated third-parties or their services.

## **Agreement to Policy**

By using our sites or interacting with an AMOCO advertisement or page or account on a third-party site, you consent to the information handling practices described in this policy. Please note that your use of our sites is additionally subject to AMOCO's [Online and Mobile Banking Policy](#). Additionally, by using AMOCO sites or other services, you expressly consent to the information handling practices and storage and access of information, including the use of cookies, as described in this policy.

## **Information We Collect and Use**

We collect the personal information you provide when you enter data into an application for membership or loan or other services and when you use our products and services. Personal information may include your name, member number, home or other physical address, Social Security Number, telephone number, email address, employment information, health information, and other types of personal information. When you access our sites or open our marketing emails, we may automatically collect non-personal information such as your IP address, device and browser identifiers, and information about your use of AMOCO sites by using cookies or other technologies. We may also obtain additional non-personal information such as demographic and statistical information from third-parties and sources other than our own, such as advertisers or social media networks.

## **Using Information**

We may use your information for purposes as allowed by law such as: servicing your account or membership; communicating with you; improving our sites, products, or services; legal compliance; risk control; information security; anti-fraud purposes; marketing or personalizing the presentation of our products and services to you; tracking website usage; and using read-receipt notifications in our email communications.

## **Sharing Information**

We do not sell your personal information. However, we may share your personal information with affiliates, partners, or services providers such as data processors and companies that help us process transactions or market products and services to you. We require that these companies process such information in compliance with this policy and use such information for the purposes for which it is provided to them.

We may use or share your non-personal information to enhance your experience on our sites, to help deliver our ads on your web browser, and to measure advertising campaign effectiveness. We may share your personal and non-personal information as required to meet legal and regulatory requirements provided by U.S. state and federal law, including in response to a court order, judicial or other government request, subpoena, or warrant in the manner legally required.

We may share your personal and non-personal information if we believe, in good faith, it is appropriate or necessary to protect AMOCO from potential liability from fraudulent, abusive, or unlawful uses; investigate and defend ourselves against any third-party claims or allegations; protect the security or integrity of our services; or protect the rights, property, or safety of AMOCO, our members, our employees, or others.

## **Cookies**

We may use certain technologies on AMOCO websites, applications, or any other products to collect information that helps us improve your online experience. These technologies include cookies, pixel tags, web beacons, and gifs. In this section, we explain the different types of cookies we may use and how you can control them.

Cookies are small text files that are stored on your computer or other device. They are used in order to make websites and software applications, including our sites, work or work more efficiently. Websites and software applications can read and write these files, enabling them to recognize you and remember important information that will make your use of a website or application more convenient, such as allowing you to navigate your account information by remembering your login credentials.

We may use cookies and information gathered through the use of cookies to make your experience with our sites more personalized based on the products, services, or other interactions you have with us and other sites. Information gathered through the use of cookies may be used to make offers to you, subject to the privacy preferences you have on file with us. We also use cookies, sometimes in conjunction with service providers, in online advertising either on our own site or on third-party sites to help determine which of our advertisements are most likely to appeal to you.

We may authorize third-parties to collect information about your web browsing behavior when you use our sites. These third-parties are generally limited to service providers who may only use any information collected to provide services and marketing solely for AMOCO. At other times, information and tools from a third-party may be embedded on our site, such as a map or information streaming from another site, including communications streaming from a third-party social media platform. These tools may function through the use of third-party cookies utilized by the third-party site. As a result, these third-parties may have access to information about your web browsing on the pages of our site where these tools are placed. You may wish to review information about these third-party sites to determine how these third-parties treat data that they obtain through the use of cookies.

We may, in certain circumstances, use Adobe Flash Player to deliver special content such as animations or for other purposes such as information security and fraud prevention. This technology is not used by AMOCO for online behavioral advertising purposes.

We may also use additional technologies such as pixel tags, web beacons, and GIFs, and may permit our third-party service providers to use these technologies. We use these technologies for purposes such as measuring the effectiveness of our advertisements or other communications, determining viewing and response rates, and determining which offers we may present to you.

### **Controlling Information**

We only use your personal information for certain purposes allowed or required by law, which you cannot limit. To learn more, please see the AMOCO [Consumer Privacy Notice](#).

You may refuse to accept cookies from AMOCO sites by activating the setting on your browser. Further information about disabling cookies can be found on your Internet browser provider's website. Disabling cookies will limit the functionality we can provide when you visit AMOCO sites. Please be aware that if cookies are disabled, you will not be able to access your accounts online with AMOCO. You may also refuse to accept Flash cookies from AMOCO sites using Adobe's Flash management tools. Please refer to information provided by Adobe for information on how to disable and control Flash objects. If you choose those options, you may limit the functionality we can provide when you visit our sites.

Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. The DNT preference is a way for users to inform websites that they do not want certain information about their webpage visits collected over time and across online services. Please be advised that AMOCO does not recognize or respond to browser-initiated DNT signals.

Note that your choice to opt out on a particular browser or device will apply only to the collection and use of information from that particular browser or device. Opting out on a particular device will not opt you out of information collection on other devices, nor will it limit cross device sharing on those other devices.

To learn more about a particular advertising network (including how to opt out), click on the industry group network symbol or link located on the advertisement. Additional information may be found by referring to the websites of the following organizations: Network Advertising Initiative, Your Online Choices, and the Digital Advertising Alliance.

Please review the Consumer Privacy Notice for information on how to opt out of certain information sharing or contact us directly at (800) 231-6053.

### **Security**

AMOCO maintains physical, electronic, and procedural safeguards to protect the security and confidentiality of personal information provided to us. While we strive to protect your information, we cannot warrant the security of information provided to us online. However, once we receive your information, we will do our best to ensure that our systems are functioning properly and will use reasonable and customary efforts to protect your information. In the event of any data breach, we will analyze the

breach to determine whether it requires the involvement of law enforcement authorities and requires notice to you pursuant state or federal law.

### **Third-Party Data Sharing**

Although we do not share your personal information with nonaffiliated third-party companies, we are aware that you may have authorized third-party companies to access your personal information and account data to offer services such as: account aggregation, payment processing, and tax preparation. These third-party companies have access to your personal information and account data. Certain third-party companies, such as third-party payment processing companies which you may authorize through the AMOCO mobile application, may request access to certain device-specific information, such as contact list information which may be used by that third-party to facilitate transactions.

We recommend that you use caution when granting access to these types of third-party companies. Some of these third-party companies may use other companies to assist them with providing services or with accessing your personal information or account data. Any of these third-party companies may be storing your personal information or account data.

We are not responsible for the use or disclosure of any personal information or account data accessed by or on behalf of any company or person to whom you provide your AMOCO login credentials or account information. We do not control the privacy, security, or accuracy of your information that may be held by these third-party companies which are governed by the third-party's privacy policy and data security program. When you provide your login credentials to your AMOCO accounts to a third-party, you will be deemed by us to have authorized all transactions or actions initiated by that third-party using the access information you provided, whether or not you are aware of the specific transaction or action. For security and other reasons, AMOCO reserves the right to block or disable third-party access to any account without notice.

If you decide to revoke the access authority you previously gave to a third-party, we recommend that you change your AMOCO password to ensure that the third-party cannot continue to access your account.

### **Health Information**

We may obtain health information in servicing you or your account such as when we notarize documents or process account forms or through other means. Health information will only be accessed by and disclosed to AMOCO employees and third-parties with a legitimate business purpose or in accordance with any other applicable law or regulation. Health information, whether in paper or electronic form, are subject to physical, electronic, and procedural safeguards and will be stored, transmitted, and disposed of confidentially and with due care.

### **Social Security Number Protection**

We consider your Social Security Number as confidential personal information. Social Security Numbers will only be accessed by and disclosed to AMOCO and its employees with a legitimate business purpose or in accordance with any other applicable law or regulation. Social Security Numbers, whether in paper or electronic form, are subject to physical, electronic, and procedural safeguards, and will be stored, transmitted, and disposed of confidentially and with due care.

### **Children's Privacy**

We request that individuals under the age of 13 do not use or access our services or provide personal information through our services at any time or in any manner. We do not knowingly collect personal information (as defined by the Children's Online Privacy Protection Act) from individuals under the age of 13 who use our sites without obtaining consent from a parent or legal guardian. To learn more about the Children's Online Privacy Protection Act, please refer to the National Credit Union Administration Regulatory Alert 01-RA-07 or to the Federal Trade Commission's website.

### **California Privacy Rights**

California law permits California residents using our sites and services to request and obtain from us once a year, free of charge, a list of the third-parties to whom we have disclosed user personal information for direct marketing purposes within the prior year, as well as the type of personal information disclosed to those parties. AMOCO does not disclose personal information to third-parties for any third-party direct marketing purposes.

### **General Data Protection Regulation**

On May 25, 2018, new privacy regulations from the European Union, known as the General Data Protection Regulation ("GDPR"), took effect. The regulations are designed to protect privacy rights of EU residents. AMOCO complies with the GDPR as applicable.

### **International Transactions**

Information collected by AMOCO is stored and processed in the United States and may be stored and processed in any other country where we or our affiliates, partners, or service providers maintain facilities or process transactions. If we provide any of your information to our affiliates, partners, or service providers, we will ensure these companies protect your information in accordance with this policy and applicable law.

### **Keeping Your Information Accurate**

It is important that we have accurate and up-to-date information about you. Please contact us immediately if you notice that your information is incomplete, inaccurate, or out of date. You can also review your personal information on our sites and request changes to your information such as your email address, mailing address, and telephone number, when necessary.

### **Policy Updates**

We may change our policy from time to time. When we do, we will let you know by posting the revised policy on our website with a new "Last Updated" date (see below) or by sending it to you directly, when required. Any changes to our policy will become effective when published to our website unless indicated otherwise. For any questions, please contact AMOCO at 2300 Texas Avenue P.O. Box 889, Texas City, TX 77592-0889.

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