

## Introduction

This Privacy Policy describes how AMOCO Federal Credit Union ("AMOCO", "we", "us", or "our"), its subsidiaries, and affiliates, and companies we engage with to render services ("Service Providers"), collect, use, maintain, and disclose information. This policy applies to visitors and users of any website, web portal, and mobile application that we own (collectively, our "Sites"). It does not apply to information collected by third parties such as other websites, content, or applications that may link to or be accessible from our Sites. Please read this Privacy Policy carefully. By accessing or using our Sites, you consent to the terms of this Privacy Policy. Please note, our digital banking website, mobile application, and video banking mobile application may have additional terms related to the privacy of your personal information.

If you applied for or have any consumer financial product or service with us, we will use and share information we collect from or about you in accordance with our [Consumer Privacy Notice](#).

## Information We Collect and Use

We collect personal information you provide to us in accordance with applicable law, such as when you enter data into an application for membership or loan or other services and when you use our products and services. The personal information that we collect from you may include your first and last name, address, e-mail address, telephone number, Social Security Number, tax identification number(s), driver's license number(s), account number(s), payment card number(s), payment card expiration date, payment card identification, verification numbers, transaction and payment history, information you provide to us when submitting feedback, and any other information that you provide to us voluntarily when you use our Sites. We may also collect information about you from third parties, including personal information about you from identity verification services and consumer reporting agencies, and non-personal information about you from advertisers and social media networks, such as demographical and statistical information.

We, including our Service Providers, may use automatic data collection technologies to collect certain information about your interactions with our Sites. We do not collect personal information automatically, but we may tie non-personal information collected automatically to personal information about you that we collect from other sources or that you provide to us. By using automatic data collection technologies, we may collect information such as your IP address, general location information such as city, state, or geographic area, analytical information, and characteristics or settings of the specific device you use to access our Sites, including your device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type, IP address, unique identifiers, language settings, cellular carrier, and radio and network information.

If you use our mobile application, we may also periodically collect, transmit, and use geolocation information associated with your device for features that are designed to prevent fraudulent card use and send alerts, but only if you expressly authorize the collection of such information. If you have enabled location services on your phone and agree to the collection of your location when prompted by the services, we will collect location data when you use the services even when the app is closed or not in use; for example, to provide our fraud detection services. If you do not want us to collect this information, you may decline the collection of your location when prompted or adjust the location services settings on your device.

We may collect biometric and online activity data about you when you access our Sites to authenticate your identity and to enhance the security of your accounts. The biometric data that we collect is strictly limited to behavioral characteristics such as keystrokes, mouse movement patterns, and navigation patterns, including pages and screens you viewed, how long you spent on a page or screen, the website you visited before interacting with our Sites, navigation paths between pages or screens, information about your activity on a page or screen, access times, and the duration of your access.

We may also use cookies, web beacons, local shared objects, and other tracking technologies to collect information on our Sites. Cookies are small text files that are stored on your device that uniquely identify your browser or store information or settings in your browser. We may use cookies and information gathered through the use of cookies for purposes permitted by law, including fraud prevention efforts, maintaining functionality during an online session, collecting data about the use of our Sites, advertising on our own Sites or other websites, monitoring the effectiveness of advertising, remembering your preferences, to make offers to you subject to your privacy preferences, and information security purposes. Web beacons are small electronic files, such as clear GIFs, pixel tags, and single-pixel GIFs, which are used to demonstrate that a website or email was accessed or opened and certain content was viewed or clicked, among other purposes. We may use or deploy web beacons on our Sites and marketing communications to count

users who have interacted with our Sites and marketing communications and for other related statistics, including verifying system and server integrity. We may use “local shared objects” to deliver content to you or for other purposes such as information security and fraud prevention.

## **How We Use Your Information**

In accordance with applicable law, we may use information that we collect about you or that you provide to us, including your personal information, to provide, service, and improve our products, services, and Sites; process applications, transactions, and payments; maintain your account(s); verifying your identity and enhancing the security of your accounts or our services; prevent, identify, investigate, and deter fraudulent, harmful, unauthorized, or illegal activity, including cyberattacks and identity theft; in order to facilitate communications with you; to comply with and enforce applicable legal requirements, our internal policies, and contractual obligations; to conduct accounting, audit, and other internal functions; to perform data analytics and research; to manage your preferences; to market or personalize the presentation of our products and services to you; and for any other purposes that we may specifically disclose at the time you provide or we collect your information.

We may also anonymize your personal information, such that the information is not associated with you, and use that anonymized information, whether or not in an aggregated form, for certain business purposes permitted by applicable law. We do not sell your personal information.

While information under our sole control is stored and processed in the United States, our affiliates, partners, or Service Providers may store and process information in other countries where they 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.

## **Disclosure of Your Information**

We may disclose your information to affiliates, partners, or Service Providers for our everyday business purposes, such as to provide our products and services to you; facilitate, maintain, and operate our Sites; measure advertising campaign effectiveness; process transactions; provide technical support; market products and services to you; and fulfill contractual obligations. We require our affiliates, partners, and Service Providers to store such information in compliance with this policy and only use such information for the purposes for which it is provided to them. At our discretion, we reserve the right to disclose anonymized information to third parties and use anonymized information in a form that does not personally identify you to analyze request patterns and usage patterns to enhance our products, services, and Sites.

We may share your information as required to meet legal and regulatory requirements provided by United States federal and state law, including in response to a court order, judicial or other government request, subpoena, or warrant in the manner legally required; if we believe, in good faith, it is appropriate or necessary to protect us from potential liability from fraudulent, abusive, or unlawful acts; investigate and defend ourselves against any third party claims or allegations; protect the security and integrity of our products, services, and Sites; or protect our legal rights, property, safety, employees, members, or others.

Although we do not share your personal information with nonaffiliated third party companies, you may authorize third party companies to access your personal information and account data to offer services such as account aggregation, payment processing, peer to peer payment processing, and tax preparation. We do not control the privacy, security, or accuracy of your information that may be held by these third party companies and urge caution when you share personal information with any third party. By authorizing third parties to connect to our Sites, those third party companies will have access to your personal information and account data. Some third party companies, such as third party payment processing companies or peer to peer payment processing companies, which you may authorize through our 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 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 login credentials to our Sites or account information. When you provide your login credentials to our Sites to a third party, you will be deemed by us to have authorized all transactions or actions initiated by that third party using the information you provided, whether or not you are aware of the specific transaction or action. For security and other reasons, we reserve 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 password to our Sites to ensure that the third party cannot continue to access your account.

## Choices About How We Use and Disclose Your Information

You are able to limit the disclosure of your information to affiliates, partners, or Service Providers as required by applicable law. Please review our Consumer Privacy Notice for more information on how to opt out of information sharing.

You may disable or remove cookies through your web browser settings. Please note that if you disable or remove cookies, some features of our Sites may continue to display properly, but you will not be able to use our Sites to access your accounts online. 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. Some web browsers transmit “do not track” signals to websites and other online services. Due to a lack of current standards across browsers, we do not respond to browser-initiated do not track signals. You may be able to manage local shared objects by referring to the Adobe website and accessing information on how to disable and control local shared objects, including Flash cookies. Disabling local shared objects may limit the functionality of our Sites.

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. We do not control third party collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative on the NAI website.

You may unsubscribe to our marketing communications at any time by clicking the “unsubscribe” link included at the bottom of the email or other electronic communication. If you provide your phone number on our Sites, we may send you notifications by SMS to provide fraud alerts or authenticate your login to our Sites. You may opt out of SMS communications by unlinking your mobile phone number through our Sites, though unlinking your mobile phone number may limit your access to our Sites. If you have consented to text message reminders about upcoming or past due loan payments, you may contact us by phone or mail to withdraw your consent at any time.

If you initially consented to the collection of geolocation information through our mobile applications, you may stop the collection of this information at any time by changing the settings on your device. Please note, however, that if you withdraw consent to our collection of location information, you may no longer be able to use certain features of our Sites, for example, certain fraud detection services.

## Linking to Third Party Websites

Our Sites may contain links to websites that are owned or operated by other entities. When you use a link online to visit other third party websites, you will be subject to that entity’s privacy and security practices, which may differ from ours. We have no control over, do not review, and are not responsible for these third party websites or their content. You should read and understand the privacy policy, terms of use, and security practices of third party websites before providing any information to third parties.

## Security

We use reasonable physical, electronic, and procedural safeguards to protect the security and confidentiality of personal information you provide to us. Please ensure that you do not send personal information to us through unsecured communication channels. Personal information sent to us through our Sites may not be secure when it is transmitted to us, and we cannot warrant the security of information provided to us online. If we receive personal information that you sent to us through unsecured communication channels, we will do our best to ensure that our systems are functioning properly and will use reasonable efforts to protect your information. You are responsible for keeping passwords used to access our Sites confidential. We are not responsible for the circumvention of any privacy settings or security measures maintained on our Sites.

## Accessing and Correcting Your Information

It is important that we have accurate and up-to-date information about you. You may 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. Please contact us immediately if you notice that your information is incomplete, inaccurate, or out of date by telephone at (800) 231-6053 or by mail at 2300 Texas Avenue P.O. Box 889, Texas City, TX 77592-0889. We may not accommodate a request to change information if we believe the change would violate any law or cause the information to be incorrect.

## **Children's Privacy**

Our Sites, including our mobile applications, are not intended for use by individuals under the age of 13. We request that individuals under the age of 13 do not use or access our Sites or provide personal information through our Sites at any time or in any manner. We do not knowingly collect personal information from individuals under the age of 13 who use our Sites without obtaining consent from a parent or legal guardian.

## **Your State's Privacy Rights**

California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Montana, Oregon, Tennessee, Texas, Utah, and Virginia, now or in the future, provide residents with rights to confirm whether we process their personal information, access and delete certain personal information, correct inaccuracies in their personal information taking into account the information's nature processing purpose (excluding Iowa and Utah), data portability, opt-out of personal data processing for targeted advertising (excluding Iowa), sales, or profiling in furtherance of decisions that produce legal or similarly significant effects (excluding Iowa and Utah), and either limit (opt-out of) or require consent to process sensitive personal data. The exact scope of these rights may vary by state. To exercise any of these rights, please make a request by contacting AMOCO Federal Credit Union by telephone at (800) 231-6053 or by mail at 2300 Texas Avenue P.O. Box 889, Texas City, TX 77592-0889.

## **Policy Updates**

We may update this Privacy Policy from time to time. When we do, we will upload the updated Privacy Policy to our website with a new "Last Updated" date. If you object to any updates, you must notify us that you wish to deactivate your access to the Services. To the extent permitted by law, your continued use of the Services after we upload updates to the Privacy Policy means that you accept the updates.

## **Contact Us**

If you have any questions or complaints about this Privacy Policy, please contact us by telephone at (800) 231-6053 or by mail at 2300 Texas Avenue P.O. Box 889, Texas City, TX 77592-0889.

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