

INTRODUCTION

Directions Credit Union, Inc. (“DCU,” “we,” “our,” “us”) is committed to protecting your identity and any information we collect. This Online Privacy Policy:

- Covers interactions with DCU digital platforms (web, mobile apps).
- Describes types of personally identifiable information (“Personal Information”) collected.
- Outlines with whom we may share Personal Information.
- Explains third-party tracking practices.
- Offers instructions for reviewing/changing personal data.
- States our response to “Do Not Track” browser settings.
- Describes privacy safeguards for children.
- Includes disclosures required by the GDPR and CCPA.
- Requires no action on your part.

WHAT INFORMATION DO WE COLLECT?

We collect Personal Information when you apply for or use our services.

Online Behavior: We may collect information about the Internet Protocol (IP) address of the device(s) you use to access Directions digital properties; your operating system and browser type; referral website information; your digital property usage and page views; your social media preferences (e.g. likes, interests, profile, etc.); your geolocation; and aggregate or non-personally identifiable information.

We may also collect personal information when you use our Sites, products, and services. Personal information that we collect may include your name or other online identifier, home or other physical address, telephone number, email address, website interactions, geolocation, device identifier, keystrokes, the contents of your communications with us, and information from a consumer report about you.

These categories of information may be collected by Directions, or by our third-party service providers, through use of various technologies, such as cookies, web beacons, pixel tags, or other technologies, to associate your online use of our digital properties and/or with offline personally identifiable information.

We may use information collected from Direction’s digital property to acquire additional information about you from our marketing partners or service providers. For example, when you submit an application for membership or for a financial product or service, we may use the Social Security number you provided online to access a consumer report which may contain a credit score and information about your creditworthiness, to determine if you meet our underwriting guidelines.

When interacting with Directions on a digital platform that is not owned by Directions such as a social media site, never include sensitive personal or non-public information. Communication with Directions about your application, membership, and accounts with us should only take place in a secure Directions channel such as Online or Mobile Banking or by phone with a Directions employee. Social media sites are not an appropriate place to conduct or discuss your financial transactions.

INFORMATION USAGE

We may use the information we collect online and that which we pair it with offline to:

- Market our products and services or those of our trusted partners.
- Make a decision about your application for a product or service.
- Service, manage, or collect on your account.
- Offer special deals or promotions.
- Process transactions initiated by you.
- Verify your identity or the information you provided on an application.
- Perform everyday business tasks such as data analytics, digital property experience optimization, fraud prevention, security enhancements, or product and service improvements.
- Respond to your questions or inquiries.
- Comply with federal, state, or local laws; civil, criminal, or regulatory investigations; or other legal requirements.
- Share with our affiliates or trusted third parties in accordance with the practices described in our Privacy and Opt Out Notice.
- Aggregate or anonymize data for analytical purposes.

REMARKETING POLICY

DCU uses remarketing to show ads to prior website visitors via cookies from platforms like Google and Facebook.

How do we use Google Analytics?

We use Google Analytics to better understand how users are visiting and using our Sites. We do not use Google Analytics to track, collect or upload any data that personally identifies an individual (such as name, address, or email address) or other data which can be reasonably linked to such information by Google. We do not receive personally identifiable information about users on our Sites. You may review further information about how Google Analytics collects and processes data and how to control the information sent to Google at “How Google uses information from sites or apps that use our services” at google.com/policies/privacy/partners/.

How do we use Google AdWords?

We also use Google AdWords for online marketing purposes. Google AdWords allows us to advertise our Sites. In the future, we may use Google AdWords for additional features, such as to “remarket”, which means that we are able to reach people who previously visited our Sites. We may also use Google AdWords to reach target audiences based on Google AdWords features. For example, we may use it to reach users based on specific interest categories, similar audiences, or use other types of interest-based advertising and demographic and location targeting. We gather information about users information (such as your name, email address or address) for advertising purposes, and we do not share personally identifiable information with Google.

In conjunction with our use of Google AdWords, Google, or third-party vendors it uses, may show our advertisements on websites across the internet and may use cookies to deliver advertisements to you based on your past visit(s) to our Sites. For more information about cookies, see “What are cookies, and how do we use them?” below.

Analytics, Display Advertising and Interest-Based Advertising Disclosure

Directions implements the following Google Analytics features based on Display Advertising:

Re-marketing, Google Display Network Impression Reporting, Google Signals, and Google Analytics Demographics and Interest reporting. We utilize these services to serve more relevant ad experiences across the web based on previous visits to our website.

- We may use Re-marketing with Google Analytics to advertise online, which means third-party vendors, including Google, may show our ads on sites across the Internet.
- Directions and third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the AdWords & DoubleClick cookie) together to inform, optimize, and serve ads based on someone's past visits to our website.
- Directions and third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as a DoubleClick cookie) together to report how our ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to visit to our site.
- We use data from Google's interest-based advertising or third-party audience data (such as age, gender, and interests) with Google Analytics to serve more relevant ad experiences across the web, based on previous visits to our website.
- We use Google Signals which is an analytics feature provided by Google that enables cross-device reporting and re-marketing. Integrated with Google Analytics, Signals helps us understand how users interact with our website across multiple devices and sessions.
- Using Google Analytics Opt-out Browser Add-on, visitors can opt-out of Google Analytics for Display Advertising and customize Google Display Network ads. Alternatively, visitors can opt out of a third-party vendor's use of cookies by visiting [DoubleClick's opt-out page](#) or the [Network Advertising Initiative opt-out page](#).

Facebook Re-marketing and Custom Audiences

Third parties may use cookies, web beacons, and similar technologies to collect or receive information from our website and elsewhere on the Internet and use that information to provide measurement services and target ads.

You can opt-out of the collection and use of information for ad targeting. To do so, go to www.aboutads.info/choices and set your data collection and ad preferences.

What are cookies, and how do we use them?

Cookies are small files containing limited data that are created when you access our Sites. Cookies can be accessed by our Sites to enhance your use of our Sites and their functionality. We use cookies to provide you with an improved and more personalized online service. Also, without revealing your identity, cookies help us confirm your identity and help us keep your transactions with us secure when you do your banking online. We also use cookies for various administrative purposes, such as maintaining continuity during an online banking session, gathering data about the use of our Sites, or monitoring our online promotions. This information helps us inform you about additional products, services or promotions that may be of interest to you.

We do not use or associate personally identifiable information (such as your name, address or email) with cookies, and cookies do not reveal personal information. Cookies are enabled by default to optimize website functionality and customize user experience. Users may elect to set your web browser to inform you when cookies are set or turn off cookies adjusting the appropriate settings on your browser. The USA.gov website, <https://www.usa.gov/optout-instructions>, provides general instructions on how to opt out of cookies or you may consult the HELP menu of your browser to learn how to turn your cookies off.

Opting out or turning off cookies still permits users to access comparable information and services; however, it may take longer to navigate or interact with the website if a user is required to fill out certain information repeatedly. Some of our business partners or associates (for example, advertisers) may use cookies on our site. However, we have no access to or control over those cookies. In conjunction with our use of Google AdWords (discussed above), Google, or third-party vendors it uses, may show our advertisements on websites across the internet. Google may also use cookies to deliver advertisements to you based on your past

visit(s) to our Sites. You may opt out of Google's use of cookies by visiting [Google's Ad Settings](#) or opt-out of third party vendor's use of cookies by visiting the [Network Advertising Initiative Opt-Out Page](#). More information about how Google uses cookies is available [here](#) and [here](#).

What do we do when your web browser sends a "Do Not Track" signal?

We do not acknowledge "Do Not Track" signals received from a user's browser. We may still collect information even if you have set your browser to send a "Do Not Track" signal.

PIXEL TRACKING AND BEHAVIORAL DATA

We may use tracking pixels, also known as web beacons or clear GIFs, in our emails, websites, and mobile apps. These small graphic files function similarly to cookies and allow us and our authorized third-party service providers to collect information such as:

- Whether and when you open an email;
- Which links you click;
- How you interact with pages on our website or app;
- Device, browser, and IP address information;
- Conversion tracking from ads or campaigns.

This information helps us:

- Measure the effectiveness of our marketing and communications;
- Improve user experience and website functionality;
- Serve personalized or interest-based advertisements.

Data Collected

Pixels may collect or be associated with the following types of data:

- Device identifiers (e.g., IP address, browser type, operating system);
- Interaction data (e.g., pages visited, time spent, clicks);
- In some cases, identifiers that may be linked to a user account or email address.

We do not knowingly associate pixel data with video viewing history or other sensitive personal information in a way that would violate the Video Privacy Protection Act (VPPA) or similar laws. We do not disclose personally identifiable information (PII) related to video content consumption to third parties without your affirmative, informed consent.

Third-Party Pixels

Some pixels are placed by third-party platforms (e.g., Meta, Google, LinkedIn) under their own privacy policies. These third parties may use the data collected to provide services to us or to serve you with targeted advertising. We require all such partners to comply with applicable privacy laws and contractual confidentiality obligations.

Tracking pixels may be linked to cookies or other identifiers that associate data with a particular device or user. While pixels do not directly collect Personal Information, they may indirectly be tied to identifiable users through interactions and combined technologies.

We may partner with advertising platforms (e.g., Google, Meta/Facebook, LinkedIn) who place and access pixels on our site to gather data for ad targeting and performance analytics. These third parties process data in accordance with their own privacy policies:

- [Google Privacy & Terms](#)
- [Facebook Data Policy](#)
- [LinkedIn Privacy Policy](#)

How You Can Control Pixel Tracking

You have choices when it comes to how tracking pixels and other related technologies are used:

- Adjust your browser or device settings to limit or block third-party cookies.
- Use privacy-focused browser extensions that block tracking scripts.
- Manage your ad preferences or opt out of behavior-based advertising through:
 - [Network Advertising Initiative \(NAI\)](#)
 - [Digital Advertising Alliance \(DAA\)](#)
- Unsubscribe from our emails or adjust your email preferences to limit tracking.

Where required by law, we will present you with a **cookie consent banner** or privacy settings tool that allows you to opt in or out of certain types of tracking, including pixels.

KEEPING YOUR INFORMATION ACCURATE

To update your info (email, phone, address), contact DCU at **1-888-508-2228** or visit a branch. Changes can also be made through our website or app.

CHILDREN'S ONLINE PRIVACY PROTECTION

The Children's Online Privacy Protection Act of 1998 ("COPPA") restricts the collection, use, or disclosure of Personal Information from and about children under the age of 13 on the internet. Directions is committed to protecting the online privacy of the children who visit our Sites and complying with COPPA.

In general, our Sites are not directed to children under the age of 13 and we request that children under the age of 13 not provide Personal Information through the Sites. We do not knowingly collect information from children under 13 without parental consent. We may collect information on domain names, dates and times of visits, and number of page views. This information contains no Personal Information and will only be used to continue to improve the overall value of our Sites. Please visit the Federal Trade Commission website www.ftc.gov for more information about COPPA.

DATA SHARING

DCU does not share Personal Information with non-affiliated third parties, but third-party apps you authorize may access your info. DCU is not responsible for how these third parties use your data. Directions may also disclose nonpublic personal information about its members under other circumstances as permitted or required by law and as described in our Privacy and Opt Out Notice.

CALIFORNIA CONSUMER PRIVACY ACT (CCPA)

California residents have rights under the CCPA, including:

- Access and Data Portability – Request details on the categories and specific pieces of personal information collected in the past 12 months.
- Deletion – Request deletion of your personal information, with legal exceptions.
- Opt-Out of Sale – Direct us not to sell your personal information.
- Non-Discrimination – We won't discriminate if you exercise your rights.

To submit a verifiable request: Email: info@directionscu.org

EU DATA SUBJECT - GDPR RIGHTS

If you are located in the European Union or European Economic Area, you have the following rights under the General Data Protection Regulation (GDPR):

- **Right to Access** – You can request access to your personal data and information on how it is processed.
- **Right to Rectification** – You may ask to correct or complete inaccurate or incomplete personal data.
- **Right to Erasure (“Right to be Forgotten”)**
- **Right to Restrict or Object to Processing**
- **Right to Data Portability**
- **Right to Withdraw Consent** – If processing is based on your consent, you may withdraw it at any time.
- **Right to Lodge a Complaint** – With your local Data Protection Authority (DPA).

If you have questions or wish to exercise your rights, please contact us at: info@directionscu.org

RESPONSE TIMING

We will respond to verified requests within 45 days, or notify you of delays (up to 90 days). No fee unless the request is excessive or unfounded.

FINANCIAL INCENTIVES

We may offer incentives (e.g., discounts) that relate to the value of your data. Participation is optional and requires opt-in consent.

WHAT MEMBERS CAN DO

- Protect your login credentials.
- Be cautious when sharing personal info.
- Keep your contact info updated.

CHANGES TO PRIVACY NOTICE

We may update this policy at any time. Changes will be communicated via email or website.

DATA RETENTION

We retain personal information only for as long as necessary to fulfill the purposes outlined in this Privacy Policy, comply with legal and regulatory requirements, resolve disputes, and enforce our agreements. Specific retention periods depend on the type of data and applicable legal requirements.

IMAGE COLLECTION

Use of our mobile application may request camera access for features requiring image capture. Users can control this via app/device settings.

HOW WE USE COLLECTED DATA (FIS SERVICES)

FIS (a DCU partner) through our Card Controls Application may:

Collect and use geolocation information linked to your device when you use our mobile apps, with your permission, and where permitted by local law. FIS uses this data as part of its processes to prevent and detect fraudulent card use and send alerts. FIS retains geolocation information processed as part of a transaction for 180 days. Where permitted by local law, FIS may monitor your geolocation information in the background while the mobile app is being used. You can change location permissions at any time, either directly in the mobile app or in your device settings. FIS may use cookies to aggregate information about the web pages you visit, so FIS can continue to improve the digital experience and improve our services. FIS does not provide your domain to third parties, other than to the vendors, such as those with whom we contract for website design and maintenance. These vendors are under contractual confidentiality requirements. FIS may disclose your Personal Data if regulatory obligations require FIS to do so, if FIS determines such disclosure is legally advisable or necessary in order to protect FIS' rights, the rights of others, or in order to prevent harm. FIS will process your Personal Data in compliance with applicable laws.

For example, we may confirm that your IP address matches the location entered into our online forms or that you are not listed as a restricted party with whom we are legally prohibited from doing business. We will only retain your data for as long as necessary to fulfill the purposes for which it was collected.

CONTACT INFORMATION

If you have any questions or comments about this notice, our Privacy Statement, how we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under the law, please do not hesitate to contact us at **1-888-508-2228** or by email at info@directionscu.org.