



## Online Privacy Policy

*Revised 01.01.2020*

### Introduction

Directions Credit Union, Inc. (“DCU,” “we,” “our” “us”) strives to serve your needs and protect your identity and any information we collect about you.

#### Our Online Privacy Policy:

- covers your interaction with DCU, its affiliates, and companies engaged by Directions and its affiliates to render online services when you visit any mobile or online site or application that we own, including, but not limited to, our website, **directionscu.org**, and our mobile apps (“Sites”);
- describes the categories of personally identifiable information (“Personal Information”) that we may collect about you when you visit our Sites.
- describes the categories of other persons or entities with whom we may share your Personal Information;
- discloses whether other parties may collect Personal Information about your online activities over time and across different websites when you use our Sites;
- describes the way you can review and request changes to any of your Personal Information that we collect;
- discloses how we respond to web browser “do not track” signals or other opt-out mechanisms;
- describes how we safeguard children’s privacy;
- describes the European Union’s General Data Protection Regulation and California Consumer Privacy Act of 2018; and
- makes clear that no action on your part is needed.

### What Information Do We Collect?

We may collect Personal Information when you enter data into an application for new products or services or when you use or apply for our products and services. Personal Information may include your name, Access Number, home or other physical address, Social Security Number, telephone number, and email address. We do not collect Personal Information from you when you simply browse our Sites. However, our Sites may collect and store the following information about your visit: the IP address from which you access our Sites; the date and time you access our Site; the Internet Address from which you linked directly to our Site; and the pages you visit and any information you request.

We take your online privacy seriously and make the safeguarding of your Personal Information a priority. We collect Personal Information only as allowed by law. The use of the internet makes it possible for other parties to collect data about your online activities over time and across different websites, including when you use our Sites. Please click to read our [privacy policy](#) for more information that we collect and share.

## Remarketing Policy

Directions Credit Union may engage in remarketing as part of our marketing efforts. Remarketing serves ads to audiences who have previously visited a website or landing page.

It matches the right people to the right message. Third parties, including Google, use cookies to serve ads based on someone's past visits to our website.

You have the choice to opt-out of remarketing.

- Opt-out of Google's [Ads Settings](#) and view [Google's Privacy & Terms](#)
- Opt-out of a third-party vendor's use of cookies by visiting the [Network Advertising Initiative opt-out page](#).
- If you don't want Facebook to show you ads based on your activity on an advertiser's websites or apps, opt-out here: [https://www.facebook.com/ads/website\\_custom\\_audiences/](https://www.facebook.com/ads/website_custom_audiences/)

### HOW DO WE USE REMARKETING FOR ONLINE ADVERTISING?

DCU uses Google Analytics, Google AdWords Conversion tracker, and other Google services placing cookies on a browser across the Directions Credit Union website(s). Google's placement of cookies helps us increase the website's general effectiveness for our visitors. These cookies are set and read by Google. You can opt-out of Google tracking. To do so, please visit the [Google Ad Settings page](#).

DCU uses AdWords remarketing, sometimes called retargeting, to market our website(s) across the Internet. Through Google, a cookie is placed on a browser. Google then reads cookies and may present a DCU ad on a 3rd party site. You may opt-out of Google's remarketing [here](#). If concerned about 3rd party cookies presenting ads by Google and other ad networks, you can visit a broader opt-out page at the [Network Advertising Initiative](#).

This agreement may be changed from time to time by posting the new Terms of Use on the website. All users agree to be subject to this agreement as it changes from time to time.

## Keeping Your Information Accurate

It is important to have accurate and up-to-date information about you. If you notice that your information is incomplete, inaccurate, or out of date, please contact us at 1-888-508-2228 or visit a branch. You can also review and request changes to certain Personal Information such as your email address, mailing address, and telephone number on our Site and Mobile App.

## **Children’s Online Privacy Policy**

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. DCU is committed to protecting the online privacy of the children who visit our Site and complying with COPPA.

In general, our Site is 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 Site. We may collect information on domain names, dates and times of visits, and the number of page views. This information contains no Personal Information and will only be used to continue to improve the overall value of our Site. We do not knowingly collect, use, or disclose Personal Information from children under 13 on the internet without prior parental consent. Visit the Federal Trade Commission website for more information about COPPA.

## **Data Sharing**

Although DCU does not share your Personal Information with nonaffiliated third-party companies, we are aware that you may choose to do so to use their services. For example, you may have authorized some third-party companies to access your Personal Information and account data to offer financial information and services such as account aggregation (consolidating your financial account information from different sources), making payments via a website or mobile application, and tax preparation. Because these third-party companies have access to your Personal Information and account data and may use your account login credentials to provide the service, we recommend that you use caution when granting such access to these types of third-party companies.

Directions is 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 DCU 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. We are also not responsible for any fees associated with these third-party services.

When you provide your login credentials to your DCU 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.

If you decide to revoke the access authority you previously gave to a third party, we strongly recommend that you change your DCU password to ensure that the party cannot continue to access your account. DCU reserves the right to block or disable third-party access to any account without notice.

## California Consumer Privacy Act (CCPA)

We collect and use Personal Information as identified in our Online Privacy Policy and our Federal Privacy Policy. The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights if you are a California Resident.

### Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose.

### Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions as provided by the CCPA. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech ensures the right of another consumer to exercise their free speech rights or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

## **Exercising Access, Data Portability, and Deletion Rights**

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by sending us a message to [info@directionscu.org](mailto:info@directionscu.org). You may also make a verifiable consumer request on behalf of your minor child. You may only make a verifiable consumer request for access or data portability twice within 12 months. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collect personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

## **Response Timing and Format**

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to [45/90] days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

## **Personal Information Sales Opt-Out and Opt-In Rights**

If you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). Consumers who opt-in to personal information sales may opt-out of future sales at any time. To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by visiting the following webpage and sending us a message.

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back into personal information sales at any time by visiting our website and sending us a message. We will only use personal information provided in an opt-out request to review and comply with the request. Unless you indicate "no," we may share personal and financial information with outside companies we contract with that are identified in our Privacy Policy. You may make your privacy choice at any time and will remain in effect unless you state otherwise. To exercise your choice, please fill out this [Do not Sell My Personal Information](#) opt-out form.

## **Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.

- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

For more information on your rights under the CCPA, please see the following:

[https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill\\_id=201720180AB375](https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180AB375)

## **What Members Can Do To Help**

DCU is committed to protecting the privacy of its members. Members can help by following these simple guidelines:

- Protect your account numbers, plastic card numbers, PINs (personal identification numbers) or passwords. Never keep your PIN with your card, which can provide free access to your accounts if your card is lost or stolen.
- Use caution when disclosing your account numbers, social security numbers, etc. to other persons. If someone calls you explaining the call is on behalf of the credit union and asks for your account number, you should beware. Official credit union staff will have access to your information and will not need to ask for it.
- Keep your information with us current. If your address or phone number changes, please let us know. It is important that we have current information on how to reach you. If we detect potentially fraudulent or unauthorized activity or use of an account, we will attempt to contact you immediately.

## **Changes to Our Privacy Notice**

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will notify you by email or through a notice on our website homepage.

## **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](mailto:info@directionscu.org).