

# TruMark Financial® Credit Union Website Policy Disclosure

Effective date: March 8, 2023

TruMark Financial® Credit Union understands the importance of protecting your privacy. This online and security policy describes how TruMark Financial collects, uses, shares, and protects information when you visit or use [www.trumarkonline.org](http://www.trumarkonline.org).

## This policy explains the following:

1. How TruMark Financial directly or through service providers (including advertising partners), may collect information when you visit, use, or interact with the credit union through any of our online services and through the credit union's advertisements ("ads") displayed via online services operated by the credit union or third parties.
2. How TruMark Financial directly or through our service providers (including our advertising partners), may use or share information collected via our online services, and associate this information with other information about you.

**Consent:** By visiting or using any of TruMark Financial's online services, responding to any electronic communications we may send you, or clicking on one of our ads, you agree to this Policy.

**Effective Date:** This Policy may be revised at any time, so we encourage you to periodically check the current version available. If we revise this Policy in a material way, we will change the "Effective" date shown at the top of this page.

**Please note:** If you have a TruMark Financial product or service, we will use and share your personal information in accordance with the privacy notice that applies to your account. However, this Policy may still be useful to you in describing our online services, and the options and choices described below are available to you as well.

## Types of information TruMark Financial collects

When you visit and browse TruMark Financial's website or mobile app, view any of the credit union's electronic communications, or interact with one of the credit union's targeted ads, TruMark Financial may collect information from your computer(s), smartphone(s), tablet(s), or other mobile device(s) (together referred to as "mobile devices"). TruMark Financial can also see what pages you access and what you click including but not limited to TruMark Financial's website, websites where loan applications are taken, and certain third party sites associated with TruMark Financial. TruMark Financial does this to determine how individuals use the website and services so that we can enhance a user's experience and make the website and services more useful. This information includes:

- Your Internet Protocol (IP) address and related information, such as your internet service provider, general location, and MAC address
- Your mobile phone number, mobile country code, unique device identifier, mobile advertising identifier (assigned by your mobile platform), the date and time of your device use, the screen size of your mobile device(s), and other mobile device-related information

- The location of your mobile device(s), if enabled on your device(s) (i.e.; when you request location-based content such as the location of the nearest TruMark Financial branch or ATM, through the credit union's website or mobile app)
- Your browsing habits via online services provided by the credit union or third parties, including search terms you entered on the credit union's website, what websites and pages you visit, how long you stay on each website page, and what actions you take while on the website page
- Search terms that directed you to the credit union's website and mobile app, which websites you came from, and which websites you visit right after leaving one of our websites
- Which TruMark Financial ads or other online content you view, access, or click/tap on
- Any actions you take in response to electronic communications that the credit union sends to you, such as opening the message or clicking an embedded link
- Photos and contacts stored on your mobile device(s) (when enabled in your mobile device settings)

Our service providers also may collect information about your browsing habits on online services offered by third parties and use it for the purposes described below.

### **Third-party information**

TruMark Financial also may collect information about you from additional online and offline sources, including our affiliates, credit reporting agencies, and other third-party sources as permitted by law.

### **How TruMark Financial collects information**

- **Browser Cookies** – Cookies are pieces of data that are stored directly on your computer, smartphone, or other internet access device. They are assigned by a web server to the browser on your device and allow the credit union to recognize your device and store user preferences for when you return to the website. Information gathered through the use of cookies may be used to make offers to you via online ads, email, U.S. mail, or telephone, subject to the privacy preferences you have on file with TruMark Financial. We do not embed your Social Security number, account number(s), or passwords into our cookies. Cookies we use do not contain or capture unencrypted personal information. You can refuse to accept these cookies and most devices and browsers offer their own cookie privacy settings. You'll need to manage your cookie settings for each device and browser you use.
- **IP Address** – Your IP Address is a number automatically assigned to the device you're using by your Internet Service Provider (ISP). An IP address is identified and logged automatically in our server log files whenever a user visits the website, along with the time of the visit and the page(s) that were visited. Collection of IP addresses is standard practice on the internet and is done automatically by many websites. The credit union uses IP addresses for purposes such as calculating site usage levels, helping diagnose server problems, to personalize/tailor your experience while engaging with us online and offline, for compliance and security purposes, and for advertising.
- **Aggregated Data** – Aggregated Data is data that we may create or compile from various sources, including but not limited to, accounts and transactions. TruMark Financial uses this information, which does not identify individual account holders, for our business purposes, which may

include offering products or services, research, marketing, or analyzing market trends, and other purposes consistent with applicable laws.

- **Social Media Sites** – TruMark Financial has a presence on social media platforms including, but not limited to, Facebook, Twitter, Instagram, and LinkedIn, that enable online sharing and collaboration among users who have registered to use such sites. Any content, such as pictures, information, or opinions that you post on social media pages, or any personal information that you make available to other participants on these social platforms, is subject to the terms of use and privacy of those hosting platforms.
- **Do Not Track Signals (“DNT”)** – Do Not Track Signals refer to an HTTP header used by Internet web browsers to request a web application disable its tracking or cross-site user tracking. When DNT is enabled, a user’s web browser adds a header to content requests indicating that the user does not want to be tracked.
- **Social Security numbers** – As required by law, in the normal course of business, TruMark Financial collects Social Security numbers in establishing, maintaining, and servicing member accounts during the application process. The credit union implements reasonable measures to protect the confidentiality of Social Security numbers, to prohibit unlawful disclosure of Social Security numbers, and to limit access to Social Security numbers.

#### **How TruMark Financial uses your information:**

TruMark Financial may use the information we collect to:

- Recognizing you when you return to our websites or use our mobile apps (and remembering your login user ID)
- Verifying your identity
- Processing applications and transactions
- Using the location of your mobile device(s) for location-based services you request
- Using contacts stored on your mobile device to add new individuals and merchants to our Bill Pay service through our mobile apps at your direction
- Using photos stored on your mobile device to do the following through our mobile apps at your direction:
  - Deposit a check
  - Pay bills through our Bill Pay service
  - Autofill information on your driver's license to open a new account
- Facilitating the operation of our websites and mobile apps
- Providing you with updates on your accounts, products and services
- Advertise and market our products and services, including:
  - Posting ads through our or third-party websites or mobile apps that may be of interest to you
  - Contacting you with ads, promotions and offers that may be of interest to you (as permitted by law and consistent with any marketing preferences that we offer and you have registered with us)

- Prevent and detect fraud and enhance the security of your account and our online services
- Conduct market research, reporting and development, including to better understand our customers, website visitors and mobile app users, improve our online services, and improve our products and services; and
- In other ways as required or permitted by law or with your consent.