

# Internet Privacy Policy

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The Credit Union is proud of the fact that you, the member-owner, trust us with your financial and personal information. We respect your privacy and take strong measures to ensure that the information you provide us is secure. Schools Financial, a division of SchoolsFirst Federal Credit Union and our financial service providers pledge to protect your privacy when you visit or use [www.schools.org](http://www.schools.org) (the "Website") by adhering to the practices described below in this Internet Privacy Policy ("Policy"). By using the Website, you consent to the terms and conditions of this Policy, including your consent to our use and disclosure of information about you in the manner described in this Policy.

## Collecting, Using and Sharing Information

### *How We Collect Information*

## Internet Marketing

The Website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies," (described below in more detail) or text files, placed on your computer to help analyze how consumers use the Website. The information generated by the cookie is transmitted to, stored and evaluated by Google. Google may also transfer this information to third parties when required to do so by law, or where third parties process the information for Google. The information generated by cookies may also be aggregated and accessed by third parties who provide us with services related to the Website. By using the Website, you consent to the processing of such data by Google and other third parties in the manner and for the purposes set forth above.

Schools Financial also advertises on the Internet. In doing so, we use Google to show our ads on a variety of websites. Google uses cookies to serve ads based on a user's prior visits to a website. You may opt out of Google's use of cookies by visiting the Google advertising opt-out page. [Click here to visit the Google advertising opt-out page.](#) You may also refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do so, you may not be able to use the full functionality of the Website.

## About Cookies

Cookies are short pieces of data used by Web servers to help identify Internet users and help computers identify return visitors. Contrary to reports about cookies and online privacy, cookies do not contain viruses and most cannot reveal any personally identifiable information about you unless you willingly provide the information. When you browse our Website, **schools.org**, you do so anonymously; information which can personally identify you is not collected. When you access our Website, SchoolsOnline, session cookies are used. Session cookies are necessary for the security of your account and are used for authentication only. The Credit Union cannot guarantee how third parties use cookies or whether they place on your computer cookies that may identify you personally. We urge you to review the privacy policies of each of the linked websites you visit.

### *How We Respond To "Do Not Track" Signals*

“Do Not Track” (“DNT”) refers 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. California law requires us to disclose how we respond to web browser DNT signals. We do not respond to or take any action with respect to a DNT configuration set in your Internet browser, and therefore, do not disable tracking.

#### *Personal Information We Collect*

When you interact with us via our Website, we will not obtain personal information about you unless you choose to provide such information. Personal information that we may collect about you through online interaction includes information that you provide, such as your name, mailing address, email address and other contact information; data resulting from your activity, such as transaction or balance information; and limited location information (for example, a ZIP code to help you find a nearby ATM).

For example, the Credit Union will ask for your email address when you enroll in SchoolsOnline in order to contact you with important information about your account, and, from time to time, to send you information about our services. The account number and password that you provide at the SchoolsOnline sign in screen is collected to verify your identity and protect your account information. We may use your email address to help diagnose problems with our server, to administer our website, and to compile general statistics.

We may also collect payment card information, social security numbers, your date of birth, and driver’s license numbers when you provide such information while using our Website.

We will retain your personal information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

#### *Other Information We Collect*

In addition to the personal information described above, we also collect anonymous demographic information, which is not unique to you, such as your ZIP code, region, preferences, interests, and favorites. We may also automatically collect information about your computer hardware, such as the IP address of the device you use to connect to the Website, the type of operating system and browser you use, type of device, search engine used, access times and dates, referring website addresses, the parts of our Website you access, the information you request, and the site you visit next.

#### *Third Party Widgets*

We may allow certain widgets (e.g., social share buttons) on our Website that allow users to easily share information on another platform, such as a social media platform. The third parties that own these widgets may have access to information about your browsing on pages of our Website where these widgets are placed. You may wish to review information at the third party sites, such as social media platforms where you have an account, to determine how these third parties collect and use such information.

### *How We Use Information*

In addition to the uses described above, we use the information for purposes as allowed by law, such as:

- To process applications and transactions;
- To service your accounts with us, including collection on accounts;
- To send you important information regarding the Website, changes to terms, conditions and/or policies;
- To track Website usage, such as number of hits, pages visited, and the length of user sessions in order to evaluate the usefulness of our Website;
- To verify your identity (such as when you access your account information);
- To respond to your requests and to communicate with you;
- To send you marketing communications that we believe may be of interest to you;
- To allow you to participate in surveys, sweepstakes, contests and similar promotions;
- For our business purposes, including data analysis, developing and improving our products and services, and enhancing our Website;
- To prevent fraud and enhance the security of our Website;
- To resolve disputes and prevent and defend claims;
- To protect our rights and property; and
- To comply with laws and regulations

### **Online Banking Security**

Schools Financial's online account access SchoolsOnline is encrypted and has security measures in place to protect against the loss, misuse and alteration of information. All sensitive transactions use Secure Socket Layer (SSL) encrypted network transmissions. Physical access to critical systems and network components is limited to specifically authorized personnel. Backups of data are maintained in a secure location, which utilizes access controls. When you use SchoolsOnline, each session is completely secure and confidential.

### **Site Usage and Monitoring**

If you are just visiting our website and not transacting with us online, you may browse our site anonymously. The Credit Union will not ask for personal information from you unless you initiate an application that requires us to begin and complete your request. We do gather data that is not personally identifiable to you to track website usage, such as number of hits, pages visited, and the length of user sessions in order to evaluate the usefulness of our site.

### **Online Behavioral Advertising**

Online behavioral advertising (also known as "OBA" or "interest-based advertising") refers to the practice of collecting information from a computer or device regarding a visitor's web-browsing activities across non-affiliated websites over time in order to deliver advertisements that may be of interest to that visitor based on their browsing history. Through OBA, we hope to deliver advertisements that are most likely to be of interest to you using information about your other web-browsing activities (e.g., the web pages you visit, search terms you enter, and the way you move through our online services on your computer or device) or your personal profile (e.g., demographic or location information). Certain companies we work with may set cookies and use related tracking

technologies, such as Google, throughout our online services or in our communications to support these OBA efforts. We do not currently offer an opt out of OBA.

### *How We Share Your Information With Third Parties*

#### **Safeguarding Customer Information**

If you are a Credit Union member, we will use and share any information that we collect from or about you in accordance with our Privacy Notice and our Opt-Out Notice, which offers you certain choices with respect to the use and sharing of your personal information. [Please click this link to see our Privacy Notice and our Opt-Out Notice.](#)

We have partners who provide you with valuable services online that we do not offer (for example, CheckFree® online bill payment and presentment and PSCUFS Visa online services). These companies may collect information directly from you in order to administer services you have requested and may share this information with Schools Financial. We hold our partners to strict confidentiality standards in compliance with the Graham-Leach-Bliley Act and prohibit them from giving your information to any party other than Schools Financial.

#### **Schools.org and Links to Other Websites**

The Credit Union provides links to other sites; however, Schools Financial is not responsible for the security or privacy practices or the content of any website other than that operated by Schools Financial or a strategic partner as outlined above. We do not know or control what information third-party websites may collect regarding your personal information. The Credit Union provides these links to you only as a convenience and does not endorse or make any representations about using such third party websites or any information, software or other products or materials found there, or any results that may be obtained from using them. We encourage you to review the privacy statements of websites you choose to link to from the schools.org Website so that you can understand how those websites collect, use, and share your information.

#### **Protecting Children's Privacy Online**

The Credit Union does not knowingly collect or use personal information from children under 13 without collecting verifiable consent from their parents. Should a child whom we know to be under 13 send personal information to us, we will only use that information to respond directly to that child, seek parental consent, or provide parental notice. For more information about the Children's Online Privacy Protection Act (COPPA), visit the Federal Trade Commission website: [www.ftc.gov](http://www.ftc.gov).

#### **Updating Your Personal Information**

Keeping your account information up-to-date is important. You can access and/or update your personal information in connection with your account or application by signing on to your account online or telephoning us at (916) 569-5400 or (800) 962-0990.

#### **Changes to the Credit Union's Policy**

The Credit Union reserves the right to revise our Policy as our business needs change or as the law requires. If we revise our policies, we will provide our members with copies of our new policies at that time. The effective date of this Policy, as indicated above, reflects the last time this Policy was revised. Any changes to this Policy will become effective when we post the revised Policy on our Website. Your use of the Website following these changes means that you accept the revised Policy.