



Last updated: June 11, 2021

# TCFCU Online Privacy Notice

## Summary

### Information Collected by TCFCU

- If you use TCFCU's websites, mobile applications, or other services, TCFCU may collect information about you, including your personal information, information from your mobile device, information about your communications with TCFCU member service representatives, and other information.
- We may collect information from a variety of sources, including from you directly, from your use of TCFCU financial services, from your communications with TCFCU member service representatives, and from third party sources.

### How TCFCU Uses and Shares Collected Information

- We may use information we collect from you to provide you with financial services, to provide you with member service, to communicate with you about your account, to offer you products or services, and for other purposes.
- We may share certain information we collect from you (including personal information) with third parties acting on our behalf (including third party payment card processors), with other financial companies for joint marketing purposes, with credit bureaus, and with other third parties.
- We may share aggregated data (which excludes your personal information) with our business partners and other third parties.

### Correcting Personal Information and Opting Out

- You may review and update certain personal information by signing in to your account, by contacting us, or by making the request in person at any of our TCFCU locations.

- You may opt out of receiving certain communications from TCFCU, such as communications regarding marketing or promotions, by clicking on the email opt out link.

## **Safeguarding Your Information**

- TCFCU is committed to maintaining the security of the data you provide us. However, please note that there is always some risk in transmitting information over the Internet.

## **Tracking and Analytics**

- The TCFCU websites currently do not respond to “Do Not Track” signals from browsers.
- We work with third-party analytics service providers, including but not limited to Google Adwords and Twitter Ads to help us better understand how you use TCFCU websites.
- Third parties may collect certain information on third-party websites where TCFCU advertises; however, we do not allow third parties to collect our users' personal information on our websites or through our online services.

## **Exclusions**

- This Privacy Notice does not apply to websites owned by other companies.
- We do not seek to collect, nor do we knowingly collect, information from children under 13.
- If you are located outside of the United States and are using the financial services, you consent to our transfer, processing, and storage of your information in the United States.

## **Contact Us**

- You may contact us by calling 800-649-3495 or by logging in to Online Banking and sending us a Secure Message.

## **Updates to Privacy Notice**

- If we update this Privacy Notice, we will note at the top of this page the date that any changes are made or become effective.
- Your inaction or continued use of the financial services, including access to the TCFCU websites, after any such updates or notices will tell us that you agree to

these changes.

## I. INTRODUCTION

Town & Country Federal Credit Union (“TCFCU” or “we”) is a not-for-profit credit union. We are committed to respecting and protecting the privacy of our online visitors and members. We recognize that individuals need to understand how their privacy is protected, so we have established the following privacy notice (“Privacy Notice”) for our users.

This Privacy Notice explains what personal information TCFCU will collect about you from our TCFCU websites and TCFCU mobile applications, both as defined below (collectively, the “online services”) as well as from third-party and offline sources. This Privacy Notice also explains how we use, protect, and disclose information to provide you with the online services and other financial services (collectively, the “financial services”).

**Do you have a financial account with TCFCU?** We use and share your personal information in accordance with the TCFCU’s U.S. Consumer Privacy Notice.

**What does personal information mean?** “Personal information” means personally identifiable information, such as your name, email address, telephone number, and account numbers. It does not include aggregated data that does not reveal your identity or anything about you individually. Rather, aggregated data consists of information about a group that includes you. Remember, aggregated data is not considered personal information.

**What does TCFCU websites refer to?** These are TCFCU's websites that link to this Privacy Notice, including but not limited to [tcfcu.com](http://tcfcu.com).

**What do TCFCU mobile applications (apps) include?** These are TCFCU's mobile apps that are available for your mobile device (e.g., phone or tablet), including TCFCU's mobile app that allows members to manage their account. You can download our app for iOS, Android, and Windows devices.

## II. INFORMATION COLLECTED BY TCFCU

Why does TCFCU collect personal information? We collect personal information because this information makes it possible for us to provide you with the full benefits of our financial services. TCFCU collects certain information from you, your devices, the

applications you use to access our financial services, and from third-party sources so that we can provide these services to you.

## 1. INFORMATION THAT YOU PROVIDE TO TCFCU

You may provide personal information directly to TCFCU both online and offline for different reasons. This information includes, but is not limited to, your name, address, email address, and phone number. You may also provide personal information to TCFCU online when you complete an online form on a TCFCU website, pay a bill online, or subscribe to eNewsletters or other electronic communications from TCFCU.

Other ways you may provide personal information are when you provide feedback to us through the TCFCU websites, respond to surveys and questionnaires that we send you, provide information to TCFCU member service representatives online, or provide personal information to us through other online means.

What's more, you may provide personal information offline to TCFCU when you complete membership or credit applications (e.g., to open a TCFCU account or apply for a loan), provide information to TCFCU member service representatives offline, deposit money, use your debit card, or provide personal information to us through other offline means.

When you sign up for or maintain a financial account with TCFCU, you may provide the types of personal information described in the U.S. Consumer Privacy Notice, including but not limited to your Social Security number and employment information.

## 2. INFORMATION AUTOMATICALLY COLLECTED BY TCFCU

In addition to the information you provide, when you use our online services, we may also automatically collect the following types of information from your devices and applications that you use.

- **TCFCU Websites:** If you use the TCFCU websites, we may collect certain information from your device or web browser, including but not limited to your browser type, your geographic location, the date and time of your visit, and the TCFCU website pages that you visit (“website data”). We may collect this information through the use of cookies, Adobe Flash objects, floodlight tags, pixel tags, web beacons, and log files. Website data alone (i.e., when it is not associated with other personal information) is not deemed to be personal information.
- **TCFCU Mobile Applications:** If you choose to use a TCFCU mobile app, we may collect certain information from the app and your mobile device (“mobile app data”), including but not limited to geographic location information, unique device identifier information, and website data (as defined above). If the TCFCU mobile

app collects any sensitive information from your mobile device that is not identified here, then we will notify you before doing so.

### 3. INFORMATION COLLECTED FROM THIRD PARTY SOURCES

In addition to personal information that you provide to TCFCU, we may also collect information about you, including personal information, from third-party sources, including but not limited to credit reports from consumer reporting agencies and information from propensity information sellers (“third-party data”). This includes, but is not limited to instances in which you affirmatively authorize third parties to provide us with information. Third-party data includes both personal information and information that is not personally identifiable to you.

When you sign up for an account with TCFCU, we may also collect information about you, including personal information, from third-party sources as described in the U.S. Consumer Privacy Notice, including, but not limited to your credit history, payment history, and account balances.

### 4. INFORMATION COLLECTED FROM ONLINE TOOLS

We may feature certain tools through our online services, such as online calculators (“online tools”). These online tools do not require you to log in or enter your contact information to use the online tool. The information you provide when using these online tools is not associated with you or your account and, for purposes of this Privacy Notice, is not considered to be personal information.

## **III. USE AND SHARING OF COLLECTED INFORMATION**

### 1. COLLECTED INFORMATION

TCFCU may use your personal information, third-party data, mobile app data, and website data to:

- Provide you with services or other products, financial services, and information that you have requested or in connection with our financial services;
- Maintain your account;
- Allow you to apply for products or services and process your applications and transactions;
- Manage our business, including performing accounting, auditing, and other internal functions;
- Verify your identity and authenticate you (such as when you request access to your account information);

- Communicate with you about your account, in response to your requests, to notify you about important information regarding financial services, and to provide you with other administrative information;
- Communicate with you about special offers, ads, events, or new products or services that may be of interest to you;
- Evaluate and improve our websites and other offerings;
- Provide you with member service;
- Personalize and tailor our services and otherwise enhance the member experience;
- Conduct research and perform analysis in order to measure, maintain, protect, develop, and improve our products and services;
- Use in the case of risk control, fraud detection, and prevention;
- Comply with laws and regulations, contractual obligations, and our own internal policies; and
- Use for other purposes as permitted by applicable law.

TCFCU may share or disclose collected information (including personal information) in the following situations:

- With third parties acting on our behalf, such as third party payment card processors, call-center operators, shippers, servicers, marketing providers, people who analyze data for us, and other service providers;
- With other financial companies for joint marketing purposes (e.g., to bring you co-branded services or products);
- If we determine a website or policy violation has occurred;
- If we believe such disclosure is necessary to identify, contract, or bring legal action regarding injury or interference with the rights and property of TCFCU, including to enforce our rights against unauthorized access or attempted unauthorized access to our information technology assets or against other inappropriate use of our financial services;
- To report to credit bureaus;
- To comply with laws, regulations, court orders, and subpoenas or similar requests for information by authorities, or as otherwise required by law;
- To respond to an emergency;
- To protect the rights, property, safety, and security of members and others; and
- To assist us in preventing or investigating fraud, security, technical issues, or to otherwise manage risks.

We may use and share your personal information as described in the U.S. Consumer Privacy Notice. The U.S. Consumer Privacy Notice also provides information about how you may limit certain types of sharing.

TCFCU does not share your personal information with nonaffiliated third parties for their own marketing purposes.

## 2. AGGREGATED DATA

TCFCU may aggregate collected information gathered from our various users (so that it no longer identifies you specifically) and share it with TCFCU's business partners and other third parties. TCFCU may also store such aggregated data for a reasonable period of time after you terminate your account(s) or stop using our financial services.

The aggregated data may also be used by TCFCU or third parties for research purposes (including to help TCFCU improve its products). This, among other uses, allows companies to develop better products for TCFCU's users.

## 3. WEBSITE DATA

In addition to the uses described above, TCFCU may use website data to improve our financial services, as well as help us understand how members are using our financial services. This information is also collected for statistical analysis, to determine what information is of most and least interest to our members, to improve the usefulness of the financial services, and finally, for other purposes described in this Privacy Notice. TCFCU may share website data with our business partners and other third parties (including for the reasons listed above).

## **IV. REVIEW AND CORRECTION OF PERSONAL INFORMATION**

You may review, correct, and update certain personal information (such as your residential address, phone number and primary email address) by signing in to your account on the TCFCU website or the TCFCU mobile app and editing the information listed in your account profile.

You may also correct or update your personal information by contacting us via the Contact Us section below or by making the request in person at any of our TCFCU locations.

## **V. OPTING OUT**

You may occasionally receive emails from TCFCU, including emails about products or services, marketing or promotions, research, and/or other topics. To contact you, TCFCU may use the information you provide to us, including email, direct (postal) mail, or phone. You may, at any time, inform us that you do not want TCFCU to contact you with marketing or promotional communications by sending your request via the Contact Us section below.

**Do you wish to opt out of TCFCU's promotional emails?** Simply click on the email unsubscribe link. After you opt out of marketing and promotional messages, you'll still receive other transactional messages, such as notifications and information relating to your account and services. If you also wish to opt out of these transactional email notifications, simply unsubscribe using the opt out link.

**Joint account holders:** If either account holder opts out of email communications, the preference is applied to all email addresses on the account.

**Do you want one user to receive email and the other to opt out?** First, unsubscribe. Then, add the preferred email back to your account by contacting us via the Contact Us section of our website.

## **VI. SAFEGUARDING YOUR INFORMATION**

TCFCU is committed to maintaining the security of the data you provide us. We use security controls that comply with applicable federal laws to protect against unauthorized access and use of your personal information that's in our custody or control. Safety measures may include computer safeguards, secured files, and buildings.

While we are focused on the security of your Personal Information, you must remember that the Internet is a global communications vehicle open to threats, viruses and intrusions from others. For this reason, TCFCU cannot promise, and you should not expect, that we will be able to protect your Personal Information at all times and in all circumstances. TCFCU cannot guarantee the security and privacy of transmissions via the Internet, and we will not be liable for any lack of security relating to the use of the Banking Services by you. You agree that you will not hold TCFCU liable for any damages resulting from any loss of privacy or security occurring in connection with any such communications.

## **VII. TRACKING; THIRD-PARTY ANALYTICS PROVIDERS; ADVERTISING**

### **1. DO NOT TRACK DISCLOSURE**

Certain web browsers may provide a do-not-track ("DNT") option. You may be able to ask your browser to inform websites that you do not wish your activities to be tracked, either with cookies or other persistent identifiers, commonly called "DNT signals."

Because there is not yet a common understanding of how to interpret web browser-based DNT signals other than cookies, our websites do not currently respond to DNT signals.



## 2. THIRD-PARTY ANALYTICS PROVIDERS

We work with third-party analytics providers, including but not limited to Google Analytics and Google Adwords, to help us better understand how you use TCFCU websites.

For example, we use Google Analytics to learn more about the types of users that visit the TCFCU websites and to help improve the TCFCU websites. Google Analytics provides us with certain data regarding the demographics of the users that visit the TCFCU websites.

To provide this service, Google Analytics may collect certain information about you from your computer, including but not limited to:

- information regarding your visit (such as the pages you visit and the length of your visit)
- information about your device (such as your IP address)
- how you got to the website, and other information about you.

You can learn more about Google Analytics and how it collects and processes data (including how to control the information sent to Google) by visiting:

[www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/)

You can opt-out of Google Analytics by using the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout/>.

Other ways you can opt out of other website data tracking include:

- accessing the TCFCU websites via the private browsing function on your browser
- clearing the cookies on your browser on a regular basis, and
- going to <http://www.google.com/ads/preferences/> to set your preferences on Google tracking.

## 3. ADVERTISING

Third parties may collect certain information on third-party websites where TCFCU advertises; however, we do not allow third parties to collect our users' personal information on our websites or through our online services.

## VIII. EXCLUSIONS

The TCFCU websites and TCFCU mobile app may contain links to websites owned by other companies. TCFCU is not responsible for the content or privacy practices of

websites owned by other companies. We recommend that you carefully review the privacy notice for each of the websites you visit because TCFCU has no control over the privacy practices or content of these linked sites.

TCFCU websites and the TCFCU mobile app are intended for use within the U.S. (unless otherwise specified). This includes any information you provide using either our websites or our mobile app.

Accordingly, if you do not reside in the U.S. and are using TCFCU online services, any personal information you provide to us may be transferred to and processed on computers in the U.S. and other countries.

The data protection and privacy laws of other countries, including the U.S., may not afford you the same level of protection as those in your own country. Do not provide your personal information to us if you do not want this information to be transferred outside of your country, or if the laws in your country restrict these types of transfers. We will handle the personal information you provide in accordance with this Privacy Notice.

By doing business or interacting with TCFCU, using our financial services, or by otherwise providing us with your personal information, you agree to the terms of this Privacy Notice and consent to the transfer, storage, and processing of your personal information to and within facilities located in the U.S. and other facility locations selected by TCFCU.

This Privacy Notice addresses our procedures for handling the personal information of members in the United States who are at least 13 years old. We do not seek to, nor do we knowingly collect, information from children under 13 years old. If a child has provided us with personal information, that child's parent or guardian may contact us to have the information deleted from our records. To do so, contact TCFCU through the information provided below in the Contact Us section.

## **IX. CONTACT US**

**Do you have questions about our Privacy Notice?** We love chatting with our members! Ask us questions about this Privacy Notice if there's something you don't understand.

**Do you need to update your information?** It's very important to keep your account information up to date. Some of your account information can be changed online, but you can also request changes in other ways.

To update your information online, go to the My Settings section in Online Banking.

To update or change any of your information in person, visit one of our locations or contact us in one of the following ways:

### **By Postal Mail:**

P.O. Box 9420  
South Portland, ME. 04116-9420

### **By Phone:**

800-649-3495

### **By Web:**

[tfcu.com](http://tfcu.com)

Log in to Online Banking and send us a Secure Message.

## **X. UPDATES TO PRIVACY NOTICE; CONSENT**

Each time you use our financial services, you are indicating you acknowledge and consent to the collection, use, and disclosure of your personal information as set forth in this Privacy Notice.

From time to time, we may update this Privacy Notice. If we do, we will note the date that any changes are made and/or when they become effective (which you can find at the top of this page).

If the changes being made are material (that is, we make a major change in the important points of this Privacy Notice), we may notify you of the changes in a more prominent way, such as through an email. Your inaction or continued use of our financial services after the revised Privacy Notice is posted or after any such notices are sent will tell us that you agree to these changes. If you do not accept the terms outlined in this Privacy Notice or the revised Privacy Notice, please do not provide us with personal information or use our financial services.