

## **PRIVACY POLICY**

Midwest Coalition of Labor Credit Union (“MCLCU”, “Credit Union”, “we”, “our”, “us”) is committed to making available financial products and services that will enable you to meet your financial needs and reach your financial goals. Protecting personal information and using it in a manner consistent with your expectations is a high priority to everyone associated with the Midwest Coalition of Labor Credit Union.

These products help you manage your money, view your transactions and accounts, making it easy to manage your finances on the go.

We partner with several third-party Service Providers (“Service Providers”) to help make the experience as user-friendly as possible. This Privacy Policy, in combination with other relevant privacy notices for Service Providers, informs you of the policies and practices regarding the collection, use and disclosure of any personal information collected from or about users in connection with our Services. You can find more information about these privacy policies and your choices on the website or by contacting the MCLCU.

### **OVERVIEW**

To ensure that you can rely on the quality of products and services we make available, our credit union stands behind the following privacy policy:

MCLCU will collect only the personal information necessary to conduct our business.

MCLCU will protect your personal information.

MCLCU will only share information when absolutely necessary.

MCLCU will partner only with businesses that follow strict confidentiality requirements.

MCLCU will offer you a choice in how your information is used. Any member of our credit union may elect to keep their information from being shared with our business partners. We will inform you on how to exercise your choice, and we will take all reasonable

We collect non-public personal information about you from the following sources:

- Information we receive from you on applications or other forms.
- Information about your transactions with us, our affiliates, or others; and
- Information we receive from a consumer-reporting agency.

We restrict access to non-public personal information about you to those employees and officials who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your non-public personal information.

We may disclose all of the information we collect, as described above to companies that perform marketing services on our behalf or to other financial institutions with whom we have joint marketing agreements.

We may also disclose non-public personal information about you to non-affiliated third parties and Service Providers as permitted by law. If you decide to terminate your membership or become an inactive member we will adhere to the privacy policies and practices as described in this notice.

## **THE TYPES OF INFORMATION COLLECTED:**

We may collect personal information from you in the following ways:

**(a) Personal Information You or a Service Provider provides to us.**

We may collect personal information from you or a service provider, such as your first and last name, address, e-mail, User IDs, telephone number, and social security number when you open a new financial account or register for other financial services. Device images/videos may be accessed when you deposit a check or use a QR code to make peer to peer payments using a Service Provider or other payments functionality. Device contacts may be accessed when you to make peer to peer payments using a Service Provider or other payments functionality. Device location may be accessed to detect and prevent card transaction fraud, deposit fraud and also to provide branch and atm locations.

We may collect the financial and transaction information necessary to provide you with the Services, including account numbers, payment card expiration date, payment card identification, verification numbers, and transaction and payment history.

If you provide feedback or contact us via email, we will collect your name, email address and any other content included in your email messages to us in order to send you a reply.

We also collect other types of personal information that you provide voluntarily, such as any information requested by us if you contact us via email or telephone regarding support for the Services.

**(b) Personal Information Collected from third parties and Service Providers.** We may collect certain information from identity verification services and consumer reporting agencies, including credit bureaus, in order to provide some of our Services.

**(c) Personal Information Collected Via Technology.** We and our Service Providers may automatically log information about you, your computer or mobile device, and your interaction over time with our Services, our communications and other online services, such as:

Device data, such as your computer's or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers, language settings, mobile device carrier, radio/network information (e.g., WiFi, LTE, 3G), and general location information such as city, state or geographic area.

Online activity data, such as pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access.

Cookies, which are text files that websites store on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, and helping us understand user activity and patterns.

Location Information. If you have enabled location services on your phone and agree to the collection of your location when prompted by the Services, we or our Service Providers will collect your location information when you use the Services; for example, to provide our fraud detection services. If you do not want this information collected, you may decline the collection of your location when prompted or adjust the location services settings on your device.

## **HOW THE MCLCU USES YOUR INFORMATION**

(a) General Use. In general, we use your personal information to respond to your requests as submitted through the Services, to provide you the Services you request, and to help serve you better. The MCLCU uses your personal information in the following ways:

- facilitate the creation of, secure and maintain your account;
- identify you as a legitimate user in our system;
- provide improved administration of the Services;
- provide the Services you request;
- improve the quality of experience when you interact with the Services;
- send you administrative e-mail and/or push notifications, such as security or support and maintenance advisories

(b) Compliance and protection. We may use your personal information to:

- comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements and internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

(c) Creation of Non-Identifiable Data. The MCLCU may create de-identified information records from personal information by excluding certain information (such as your name) that makes the information personally identifiable to you. The MCLCU may use this information in a form that does not personally identify you to analyze request patterns and usage patterns to enhance our products and services. We reserves the right to use and disclose non-identifiable information to third parties at our discretion.

## **DISCLOSURE OF YOUR PERSONAL INFORMATION**

The MCLCU discloses your personal information as described below.

(a) Third Party Service Providers. We may share your personal information with third party or Service Providers that perform services for or on behalf of the MCLCU, for the purposes described in this Privacy Policy, including: to provide you with the Services; to conduct quality assurance testing; to facilitate the creation of accounts; to optimize the performance of the Services; to provide technical support; and/or to provide other services to us.

(b) Corporate Restructuring. It may be necessary to disclose your personal information in the unlikely event of a negotiation of any merger, financing, acquisition or dissolution transaction involving the sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency,

bankruptcy, or receivership, personal information may also be transferred as a business asset. If our operation or assets are acquired by another company, that company will possess the personal information collected by the MCLCU and the company will assume the rights and obligations regarding your personal information as described in this Privacy Policy.

(c) Authorities and Others. Regardless of any choices you make regarding your personal information, we may disclose your personal information to law enforcement, government authorities, and private parties, for the compliance and protection services described above.

## **LINKS TO OTHER SITES**

The Services may contain links to third party websites. When you click on a link to any other website or location, you will leave the Services and go to another site and another entity may collect personal and/or anonymous information from you. The MCLCU's provision of a link to any other website or location is for your convenience and does not signify our endorsement of such other website or location or its contents. We have no control over, do not review, and cannot be responsible for these outside websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these outside websites. We encourage you to read the privacy notice of every website you visit.

## **YOUR CHOICES REGARDING YOUR INFORMATION**

You have several choices regarding use of information on the Services.

(a) How We Respond to Do Not Track Signals. Some web browsers transmit "do not track" signals to the websites and other online services with which your web browser communicates. There is currently no standard that governs what, if anything, websites should do when they receive these signals. We currently do not take action in response to these signals. If and when a standard is established, we may revise our policy on responding to these signals.

(b) Access, Update, or Correct Your Information. You can access, update or correct your information by changing preferences in your account or contacting the MCLCU. Please contact us for details on how to accomplish this.

(c) Opting Out SMS Communications. If you provide your phone number through certain Services, you may receive notifications by SMS, such as provide a fraud alert. You may opt out of SMS communications by unlinking your mobile phone number through the specific Services.

(d) Opting Out of Location Tracking. If you initially consented to the collection of geo-location information through the Services, you can subsequently stop the collection of this information at any time by changing the preferences on your mobile device. Please note, however, that if you withdraw consent to the collection of location information, you may no longer be able to use some features of the Services.

## **SAFEGUARDS AND RETENTION**

We implement reasonable administrative, technical and physical measures in an effort to safeguard the information in our custody and control against theft, loss and unauthorized access, use, modification and disclosure. Nevertheless, transmission via the internet is not completely secure and we cannot guarantee the security of your information.

Laws and regulations require that financial institutions retain original, active and historical records. Your personal and financial data will be retained for a period of five to ten years, depending on applicable laws, regulations and legitimate business needs.

### **A NOTE ABOUT CHILDREN**

The Services are not directed towards individuals under the age of 18, and we do not intentionally gather personal information about visitors who are under the age of 18. If a child under 18 submits personal information to us and we learn that the personal information is the information of a child under 18, we will attempt to delete the information as soon as possible.

### **PRIVACY NOTICE UPDATES**

This Privacy Notice is subject to occasional revision. Your Financial Institution or TouchBanking may notify you, in their sole discretion, of any material changes in TouchBanking's collection, use, or disclosure of your personal information by posting a notice on the Services. Any material changes to this Privacy Notice will be effective thirty (30) calendar days following notice of the changes on the Services or immediately where no notice is given. These changes will be effective immediately for new users of the Services. If you object to any such changes, you must notify TouchBanking prior to the effective date of such changes that you wish to deactivate your account. Continued use of the Services following notice of any such changes (or use of the Services after any such changes) shall indicate your acknowledgement of such changes.

### **CONTACT**

If you have any questions or complaints about this Privacy Policy or our data collection or processing practices, or if you want to report any security violations to us, please contact us by phone at: (708) 482-9606; or by mail at:

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