

Last Modified: February 21, 2023

### Introduction

First Technology Federal Credit Union ("Company" or "We") respect your privacy and are committed to protecting it through our compliance with this Online Privacy Statement.

This Online Privacy Statement describes the types of information we may collect from you or that you may provide when you visit the website firsttechfed.com (our "Website") and our practices for collecting, using, maintaining, protecting, and disclosing that information. This Online Privacy Statement is in addition to other privacy disclosures set forth in the <u>Disclosures and Privacy Notice</u> page available on our Website under the <u>Help</u> tab.

This Online Privacy Statement applies to information we collect:

- · On this Website.
- In email, text, and other electronic messages between you and this Website.
- Through mobile and desktop applications you download from this Website, which provide dedicated non-browser-based interaction between you and this Website.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by the Company or any third party (including our affiliates and subsidiaries); or
- Any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this Online Privacy Statement carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this Online Privacy Statement. This Online Privacy Statement may change from time to time (see Changes to Our Online Privacy Statement). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the Online Privacy Statement periodically for updates.

### Children Under the Age of 16

Our Website is not intended for children under 13 years of age. No one under age 13 may provide any personal information to or on the Website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Website through any of its features, register on the Website, use any of the interactive or public comment features of this Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at 855.855.8805.

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please see Notice to Consumer of State Privacy Protections for more information.

#### Information We Collect About You and How We Collect It

We collect several types of information from and about you (Personally Identifiable Information (PII), non-PII, Demographic and Geographic) on our Website, including information:

- By which you may be personally identified, such as name, postal address, e-mail address, telephone number, social security number/any other identifier by which you may be contacted online or offline ("personal information").
- That is about you but individually does not identify you, such as account numbers, payment card identification numbers, verification numbers, transaction, and payment history; and/or

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· About your internet connection, the equipment you use to access our Website, your location, and usage details.

We collect this information:

- · Directly from you when you provide it to us.
- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and
  information collected through cookies, web beacons, and other tracking technologies.
- · Using website analytics software from Google Analytics.

#### Information You Provide to Us

The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering for online banking, filling out online application forms, submitting online forms, etc. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with our Website.
- · Records and copies of your correspondence (including email addresses), if you contact us.
- · Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions you carry out through our Website and of the fulfillment of your orders. You may be required to provide financial information before submitting an application through our Website.
- · Your search queries on the Website.
- · Your responses and/or interactions to online marketing campaigns.

You also may provide information to be published or displayed (hereinafter, "posted") on public areas of the Website, or transmitted to other users of the Website or third parties (collectively, "User Contributions"). Your User Contributions are posted on and transmitted to others at your own risk. Although, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

### Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you
  access and use on the Website.
- · Information about your computer and internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). Click the Cookie Preferences link in the footer of our Website for information on how you can opt out of behavioral tracking on this Website.

The information we collect automatically does not include personal information, but we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- · Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

• Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain



parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.

Web Beacons. Pages of our Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear
gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an
email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and
server integrity).

We do not collect personal information automatically, but we may tie this information to personal information about you that we collect from other sources or you provide to us.

#### How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- · To provide you with notices about your account.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- · To notify you about changes to our Website or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our Website.
- · For Search Engine Marketing purposes, including:
  - Google Ads. We use Google Ads service to advertise on the Google search result page. Google uses cookies to serve ads based
    on your past visits on our website. For more information on Google AdWords services and how to opt-out, please refer to Google
    specific privacy policy and settings for Google ads.
- GOOGLE DYNAMIC REMARKETING. First Tech Federal Credit Union uses remarketing services to advertise on third party websites to
  you after you visited our Service. We and our third-party vendors use cookies to inform, optimize, and serve ads based on your past visits
  to our Service.

Our website uses Google Remarketing, a service of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). This service uses cookies and similar technologies to display personalized advertising messages on websites that work with Google. Cookies and similar technologies are also used to perform the analysis of website usage as a basis for the creation of interest-based advertisements.

If you use a Google Account, depending on the settings in your Google Account, Google may link your Google web and App browsing history to your Google Account and use information from your Google Account to personalize ads. If you don't want this association with your Google Account, you'll need to log out of Google before you can access our contact page.

As described above, you can configure your browser to reject cookies, or you can prevent the collection of data generated by the cookies and related to your use of this website and the processing of this data by Google by accessing the <u>Google Advertising Settings</u> and setting the personalization buttons to "Off". Alternatively, you can opt out of processing by visiting the <u>TRUSTe</u> Web site and clicking the Google Opt-out button.

Please refer to Google's privacy policy for more information on dynamic Remarketing.

- In any other way we may describe when you provide the information.
- · For any other purpose with your consent.

We may also use your information to contact you about our own and third-parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, please see our <u>Privacy Notice</u>.

### **Disclosure of Your Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

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We may disclose personal information that we collect or you provide as described in this Online Privacy Statement and our Privacy Notice:

- · To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Company's assets, whether as an ongoing concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Company about our Website users is among the assets transferred.
- To fulfill the purpose for which you provide it. For example, if you give us an email address to use in a "refer a friend" campaign on our Website, we will transmit the contents of that email and your email address to the recipients.
- For any other purpose disclosed by us when you provide the information.
- · With your consent.

We may also disclose your personal information:

- · To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our Membership and Account Agreement and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Company, our members, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

## **Choices About How We Use and Disclose Your Information**

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

Tracking Technologies and Advertising. You can set your browser to refuse all or some browser cookies, or to alert you when cookies
are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

Please note that our Website may not work correctly if you change certain preferences, such as disabling all cookies.

Please also note that after applying these settings, you will continue to receive advertising, although it may not be tailored to your likely interests using information collected from cookies and similar technologies on your device.

- First-Party Cookies. If you'd rather we didn't use cookies when you visit us, click <a href="here">here</a> for information on how to configure your browser settings to reject cookies. Please note, disabling these types of cookies won't turn off advertising on our websites and the advertising you see may be less relevant to you.
- · Third-Party Cookies. If you would like to opt-out of third-party cookies, here are some options:
  - If you would like to opt-out of receiving personalized ads from third party advertisers and ad networks who are members of the Network Advertising Initiative (NAI), or who follow the Digital Advertising Alliance's (DAA) Self-Regulatory Principles for Online Behavioral Advertising, you can by visiting the opt-out pages on the NAI website and DAA website to opt out.
  - Google provides a suite of tools to control its cookies:
    - Google Analytics, which is a tool used to track and report website traffic, provides an opt-out browser add-on that can be downloaded here.
    - Google Safety Center has a tool where you can control the ads you see on Google and control the data used for serving ads to you. It can be found here.
    - If you wish to block other cookies, including those being served by companies that are not part of the NAI or the DAA you can use the browser-level cookie controls described below.
- **Browser-level cookie controls**. Most browsers allow you to manage cookie settings. These settings can usually be found in the 'Settings', 'Options' or 'Preferences' menu of your browser.
- Disclosure of Your Information for Third-Party Advertising. If you do not want us to share your personal information with unaffiliated or non-agent third parties for promotional purposes, you can opt-out by filling out our Opt Out page.
- Promotional Offers from the Company. If you do not wish to have your email address/contact information used by the Company to
  promote our own or third parties' products or services, you can opt-out by filling out our Opt Out page. If we have sent you a promotional



email, you may unsubscribe from future email distributions. This opt out does not apply to information provided to the Company as a result of a product purchase, product service experience, or other transactions.

We do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

California residents may have additional personal information rights and choices. Please see <u>Notice to Consumer of State Privacy</u> Protections for more information.

### **Accessing and Correcting Your Information**

You can update your Information Sharing and Communication Preferences by visiting the Opt Out page.

### **Your California Privacy Rights**

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, visit <a href="https://www.firsttechfed.com/state-privacy">https://www.firsttechfed.com/state-privacy</a>.

### **Data Security**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions and application data will be encrypted using SSL technology.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards. The information you share in public areas may be viewed by any user of the Website.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any **privacy** settings or security measures contained on our Website.

#### **Changes to Our Online Privacy Statement**

It is our policy to maintain the most current version of this Online Privacy Statement on the <u>Disclosures and Privacy Notice</u> page available on our Website under the <u>Help</u> tab. If we make material changes to this Online Privacy Statement or how we treat our users' personal information, we will notify you (a) via the email address we have on file for you that changes to this Online Privacy Statement have been made and (b) through a notice posted on the <u>Disclosures and Privacy Notice</u> page available on our Website under the <u>Help</u> tab. The date the Online Privacy Statement was last revised is identified at the top of such page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this policy to check for any changes.

### **Contact Information**

To ask questions or comment about this Online Privacy Statement and our privacy practices, contact us at:

PO Box 2100 or via our toll-free number:

Beaverton, OR 97075-2100 855.855.8805

To register a complaint or concern, please visit <a href="https://www.firsttechfed.com/help/contact">https://www.firsttechfed.com/help/contact</a> and fill out the "Suggestions, ideas, privacy inquiries, complaints, and comments" form.

