

# ONLINE PRIVACY POLICY

This Policy is Effective as of: July 17, 2017

At Orange County's Credit Union ("Credit Union", "we", "our", "us"), we respect your right to privacy and understand the importance of maintaining the security of your personal information in your dealings with us. We strive to keep the information you share with us secure and confidential. This Online Privacy Policy ("Policy") only relates to the information we collect online through [www.orangecountyscu.org](http://www.orangecountyscu.org) ("Site"), and our Mobile Banking application.

## Security and Confidentiality

Keeping your financial information secure is a top priority. Our associates only access your information when necessary to complete a transaction you request, respond to an inquiry, maintain your account, or as otherwise required or permitted by law. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your non-public personal information. Our staff is trained to comply with our established security procedures.

## Information We Collect About You

When you visit our Site, inquire about our products or services, completed any of our forms, or when opening an account, you may be asked to provide information about you that is personally identifiable ("Personal Information"). This may include:

- Your first and last name;
- A home or physical address (including street name or name of a city or town);
- An e-mail address;
- A telephone number;
- A tax identification number; and
- Any other identifier that permits physical or online contact with you.

In addition, we may collect and store the following information about your visit: the IP address from which you access our Site; the type of browser and operating system used to access our Site; the date and time you access our Site; the Internet address of the site from which you linked directly to our Site; and the pages you visit and the information you request. We collect information about you that is necessary to provide the information, products or services. In order to analyze and meet your financial needs, we may also use other information about you that is publicly available, such as information from credit reports, public records or market research.

## Google Analytics

We use Google Analytics to understand how visitors engage with our Web site. For information on how Google uses the data it collects, and how to control the information sent to Google, please visit [Google's Privacy & Terms](#).

## Cookies and "Do Not Track" Mechanisms

Orange County's Credit Union will occasionally use a "cookie" for the purpose of providing an improved service. A cookie is a small piece of data given to your browser by a website, which can later be retrieved. A cookie is a way for website to recognize whether or not you have visited the site before. The cookie can be read by the website that "set" the cookie. We use cookies for administrative purposes, such as online banking session management, or in areas where you are able to customize the information you see. The use of cookies makes your online experience easier and more personal.

You may elect to set your web browser to inform you when cookies are set, prevent them from being set, or enable your web browser's "Do Not Track" signal or similar mechanism. However, if you elect to prevent cookies from being set or enable your web browser's "Do Not Track" signal or similar mechanism, some web banking functions may not work properly.

## Google Ads Across the Web

We use a third party for online advertising. "Google Ads Across the Web" uses cookies to serve ads based on someone's past visits to our Web site. To opt out of Google's use of cookies, please visit [Google's Ads Settings](#).

## Affiliated Companies With Whom Orange County's Credit Union May Share Information

We limit our information sharing practices to those companies with whom we have agreements to provide you a wide variety of financial products and services such as insurance and securities firms, or those that assist the credit union in providing

these services - for example, our ATM Network, Mortgage Company and Shared Service Centers. Those companies agree not to disclose the information received by the Credit Union. We may also share information with our affiliated Credit Union Service Organization in order to make other services available to you. In certain instances, you have the right to tell us not to share information with these entities.

### **Account Aggregators**

Many companies are offering account aggregation services that collect information from all of your accounts at financial institutions, brokerages, etc. and consolidate the information into one site for your convenience. In order for this to happen, you will have to provide a company with sensitive account information, personal identifiers and an access code or Personal Identification Number. By giving up your access code or PIN, you are authorizing that company to access your account. All transactions conducted by the account aggregator using an access code you provide to them are considered authorized by you.

### **Accurate Information**

We endeavor to keep our information about your accounts accurate and current. If you find any problems with any of your statements or other credit union information, please contact us in writing at Orange County's Credit Union, PO Box 11777, Santa Ana, CA 92711-1777 or by phone at 888-354-6228, during regular business hours. We will research your request and correct any inaccuracies.

### **Children's Online Privacy Protection Act ("COPPA") Disclosure**

The Children's Online Privacy Protection Act of 1998 ("COPPA") restricts the collection, use, or disclosure of Personal Information from and about children under the age of 13 on the internet. Orange County's Credit Union is committed to protecting the online privacy of the children who visit our Site and complying with COPPA.

In general, our Site is not directed to children under the age of 13 and we request that children under the age of 13 not provide Personal Information through the Site. We may, however, elect to provide contest information on our Site for our youth Members, which includes children under the age of thirteen (13). Youth Members who identify themselves to be under the age of thirteen (13) will not be permitted to submit any Personal Information on our contest Site.

We may collect information on domain names, dates and times of visits, and number of page views. This information contains no Personal Information and will only be used to continue to improve the overall value of our Site. We do not knowingly collect, use, or disclose Personal Information from children under 13 on the internet without prior parental consent. Visit the Federal Trade Commission website for more information about COPPA.

### **Updates to this Policy**

This Policy is subject to change at any time. Please review it periodically. Orange County's Credit Union will revise the "Effective Date" stated at the top of this Policy at the time any material changes to the Policy are made. Your use of the Site following these changes means that you accept the revised Policy.

### **Contact Us**

If you have any questions regarding this Policy call us at (888) 354-6228 or write to us at:

Orange County's Credit Union  
P.O. Box 11777  
Santa Ana, CA 92711-1777