

## Website and Mobile Application Privacy Policy

Last updated on 3/10/2021.

### 1. INTRODUCTION

People's Trust Federal Credit Union (hereinafter, "People's Trust Federal Credit Union"), created this privacy policy to demonstrate our firm commitment to your privacy and protection of your information. This policy covers how People's Trust Federal Credit Union and its subsidiaries manage personal information that we collect and receive related to your use of our web services and mobile applications (hereinafter collectively, "Services").

We do not share your information with non-affiliated third parties for purposes of selling their products and services to you.

### 2. INFORMATION COLLECTION AND USAGE

You may be asked to provide your personal information when you use one of our Services. In those instances, we may collect the following types of information:

- Identification information, including but not limited to: name, street address, e-mail address(es), telephone and facsimile number(s), social security number (or other government issued verification numbers), and date of birth.
- Information pertaining to your financial or credit account(s), including but not limited to: account numbers, account balances, account transactions, and parties to account transactions.
- Information obtained when verifying your registration when using our Services, including but not limited to: username, password, and secret questions and secret answers for resetting passwords.
- Information from your browser or mobile device, including but not limited to: location, Internet Protocol address, type of mobile device, mobile operating system, browser type, pages you visit and the information you request, product interaction, and the date and time of your access.
- E-mails or other communications sent to us by you.

People's Trust Federal Credit Union uses the above-listed information, only as permitted by law, for the following purposes:

- To complete transactions and provide services authorized by you.
- For general business purposes, including but not limited to, to provide you access to your account(s), to service your inquiries and requests, to authenticate you when you log in, to diagnose problems with the website or application, to send you information about your account, to notify you of new products or applications being released, to prevent fraud and unauthorized transactions, to verify your identity, to determine and confirm your transaction limits, to perform collections, to comply with laws and regulations, to protect the personal safety of subscribers or the public, to prevent and defend claims, to resolve disputes, to troubleshoot problems, to analyze our products and services, to enforce our

terms of use for our Services, to protect our rights and property, and to customize, measure, and improve our Services.

- For advertising purposes, the People's Trust Federal Credit Union mobile application collects and uses location data in the background for geofencing and beacon scanning which is essential for advertising/marketing campaign delivery

### 3. INFORMATION SHARING AND DISCLOSURE

We may share your information in the following limited circumstances:

- When your consent is expressly provided.
- With companies that assist us in administering and bringing you our Services. The information shared with these companies typically includes information to process transactions on your behalf, conduct our operations, follow your instructions as you authorize, or protect the security of our financial records. These companies may include credit, product development, and data processing vendors; however, these companies do not use your personal information for any secondary purposes. These companies have also entered into written agreements with People's Trust Federal Credit Union which include confidentiality provisions to protect your information.
- With other financial institutions, such as member credit unions, with which we have written agreements that include confidentiality provisions to protect your information. The information shared with these financial institutions typically includes information to verify accounts, confirm transactions, and to coordinate and improve the Services provided to you.

There are other situations when we may disclose to third parties your personally identifiable information, when permitted or required by law, such as in response to legal process or to government entities, or when you have requested us to share information about you with a third party.

### 4. HOW WE PROTECT YOUR PERSONAL INFORMATION

We take appropriate measures to ensure that your information is not compromised. Access to personal information is restricted to employees and the above-referenced third parties on a need-to-know basis who have a specific business purpose to access your data. Our employees who are granted access to your information are bound by strict confidentiality obligations and may be subject to discipline for breaching these obligations. Third parties are bound by a confidentiality provision in their agreements with us, which prevents these third parties from making your information available for any reason other than that which was intended. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your personal information. We will continue to test and update our technology to make improvements as necessary in protecting your personal information.

This site has security measures in place to protect against the loss, misuse, or alteration of your information under our control. We use state-of-the-art SSL

encryption technology to ensure that your data is secure during transmission to and from us.

## 5. FORMER CUSTOMERS

If you are no longer using our Services, we may continue to store and protect your personal information pursuant to this privacy policy, and as required by law, including but not limited to the following purposes: risk management, regulatory compliance, and audits.

## 6. E-MAIL SECURITY

If you received an e-mail from us, (a) your e-mail address is either listed with us as someone who has expressly shared this address for the purpose of receiving information in the future (“opt-in”), or (b) you have registered, have an existing relationship with us, or are using our Services. We respect your time and attention by controlling the frequency of our e-mails.

Each e-mail sent contains an easy, automated way for you to cease receiving e-mails from us, or to change your expressed interests. If you wish to do this, simply follow the instructions at the end of any e-mail.

## 7. COOKIES AND SIMILAR TECHNOLOGIES

Cookies are electronic markers that are stored directly on the computer you are using to indicate activity or access to a specific website or pages contained on a website. When you return to our website, your browser will give that information back to our server. We use cookies to maintain the state of your session on our website and to store your computer’s configuration data. This cookie data is tied to your personally identifiable information to enable our Services. If you disable cookies on the computer you are using, you will not be able to use our Services. We do not encode your personally identifiable information in our cookies. Some of our business affiliates use cookies on their sites. We have no access to or control over these cookies.

## 8. WEB BROWSER DO NOT TRACK SIGNALS

We do not respond to web browser “do not track” signals because we do not allow third parties to collect personally identifiable information of visitors to our website to track their online activities.

## 9. MODIFYING YOUR PERSONAL INFORMATION

You may access and modify your personal information at any time by logging into your account via our website and clicking the Account Settings tab, or by using one of our mobile applications.

## 10. CHILDREN

Our Services are available through general audience websites, and we do not knowingly collect or use personal information from children under 13.

## 11. PRIVACY POLICY CHANGES

People's Trust Federal Credit Union is always improving our Services. As our Services evolve, we may update or amend this privacy policy. If we modify this policy, we will post the revised privacy policy online. The revised policy will be effective immediately at the time of posting, unless a later effective date is expressly stated therein. We will also revise the "last updated date" stated above.

Should any modification materially change how we use your personal information, we will provide notice online prior to the effective date of the change.

It is your responsibility to periodically review this privacy policy. Users are bound by any changes to this privacy policy by using our Services after such changes have been first posted.

## 12. CONTACT INFORMATION

If you have any questions regarding this privacy policy, you may contact us via the information provided below:

People's Trust Federal Credit Union  
PO BOX 4511  
Houston, TX 77210