

**PIEDMONT ADVANTAGE CREDIT UNION**  
**Online Privacy Notice Policy**

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FINAL

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## **Section 1 PURPOSE**

Piedmont Advantage Credit Union (“us” or “we”) respects your privacy and is committed to protecting it through our compliance of this Online Privacy Notice Policy (“Notice”). This Notice describes the types of information we may collect from you or that you may provide when you visit our website and our practices for collecting, using, maintaining, protecting and disclosing that information.

This Notice applies to information we collect:

- On our website, [www.pacu.com](http://www.pacu.com).
- In email between you and the website.
- Through desktop and mobile device applications, including our card management app, MyPACUCard, you may download.
- When you interact with our advertising and applications on third-party websites and services if those applications or advertising include links to this Notice.
- Through any other means associated with or relating to our website.

By using our website and mobile device applications, you agree to the terms and conditions of this Notice. We work with third party providers who are contractually obligated to comply with our policies to protect information. However, if you visit or access one of these provider websites or mobile device applications, we recommend that you review the online privacy practices of that site or mobile device application to understand the specifics of how your online personal information may be collected, used and shared.

This Notice is subject to change without notice. We update this Notice periodically to comply with federal and state laws. If we make changes to this Notice, we will revise the “Last Updated” date at the end of this document.

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## **Section 2 ONLINE PRIVACY PRACTICES**

We are transparent about how we collect your personal information in order to provide you with our new and existing products, services and programs. We ask for your consent when required, otherwise by using our website and mobile device applications, you consent to the collection, use and sharing of your personal information subject to and consistent with applicable laws and other notices you may have received based on your relationship with us.

To protect your personal information from unauthorized access and use, we use security measures that comply with applicable federal and state laws. These measures may include safeguards and secured files and buildings as well as oversight of our third party providers to ensure personal information remains confidential and secure. In the event of a data breach, we provide timely notification, in accordance with applicable laws.

Our website is not intended for children. Our website and mobile device applications are not marketed to individuals under the age of 13, and we request that these individuals do not provide personal information through our website and mobile device applications. We do not knowingly collect personal information from children under 13.

We collect personal information about you through your desktop or mobile devices with the use of cookies and similar tracking technologies as well as personal information you provide when you visit or use our website and mobile device applications, for example when you:

- Open a new account online
- Complete an online inquiry or “Contact Us” form
- Schedule an appointment online
- Participate in an online promotion activity

We may use third party providers to process personal information for business purposes on our behalf. These providers are contractually obligated to comply with our policies to protect information we share with them or they collect on our behalf.

The information we collect on or about may include:

- Information that you provide by completing forms on our website.
- Records and copies of your correspondence, including email addresses, if you contact us.
- Any comments and information you provide us when you use the “Contact Us” feature on our website.
- Your responses to surveys.
- Details of transactions you carry out on or through our website.
- Your search queries on our website.
- Any other information you provide to us or we collect throughout your usage of or access to our website.

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### **Section 3 AUTOMATIC DATA COLLECTION TECHNOLOGIES**

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

- Details of your visits to our website, including traffic data, location data and other communication data and the resources that you access and use on the website.
- Information about your desktop or mobile device and about your internet connection, including your IP address, mobile device identifier, your operating system, browser type and the name of your mobile carrier.

We also may use these technologies for behavior tracking to collect information about your online activities over time and across third party websites or other online services.

The information we collect automatically is statistical data and may also include personal information. This helps us to improve our products, services and programs and 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.
- Analyze our products, services and programs and perform market research.

When you visit or leave our website by clicking a hyperlink or when you view a third-party website that includes our tags or cookies, we automatically receive the URL of the website from which you came or the one to which you are directed.

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 desktop. While you can set your browser to not allow cookies, we may be unable to honor that request and may track your activity and collect information about you and your online activities even when the browser is set to “do not track.”
- Flash cookies. Certain features of our website may use local stored objects or flash cookies to collect and store information about your preferences and navigation to, from and on our website. Flash cookies are not managed by the same browser settings as are used for browser cookies and you may be unable to shut down our collection of and use of information through this technology.
- Web beacons. Pages of our website and our emails may contain small electronic files known as web beacons or also referred as pixel tags that permit us, for example, to count users who have visited those pages or opened an email and for other related website statistics.

Upon visiting our website, you may be presented with a cookie banner notifying you of our use of cookies to enhance site navigation, analyze site usage and assist with overall marketing efforts.

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## **Section 4 ANALYTICS**

We use third party analytics providers, including Google Analytics to analyze traffic and activity patterns on our website. This data is used to track and examine the use of our website. Analytics tools track many variables, including what website you visited prior to coming to our website, and how long you stay on a particular webpage.

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## **Section 5 INFORMATION USE**

We may use information that we collect about you or that you provide to us to:

- Present our website and its contents to you.
- Provide you with information about our products, services and programs that you request from us.
- Fulfill any other purpose for which you provide.
- Provide you with notices about your account and/or the website.
- Carry out our obligations and enforce our rights arising from any contracts entered between you and us, including billing and collections if needed.
- Notify you about changes to our website or any products, services and programs we offer.
- Allow you to participate in interactive features on our website when offered.
- Develop and create our products, services and programs.
- Conduct behavioral tracking and any other purpose as needed for our operations with your consent.
- Enable us to display targeted advertisements.

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## **Section 6 LINKING TO OTHER SITES**

To provide you with convenient access to information, we may provide links to other third-party websites such as mortgage companies, insurance companies, government agencies and more. These links are provided as a convenience to our members. We do not guarantee or endorse any of the content in these links, and we do not represent either the third party or the member if the two enter into a transaction. The privacy and security policies on these linked websites may differ from those practiced by us. We are not responsible for accuracy, security, content or services offered by other websites. We encourage you to read the privacy policies of all websites you visit, especially before providing any personal non-public information.

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## **Section 7 ENFORCEMENT AND OVERSIGHT**

In accordance with the Policy Administration Policy, any changes to this policy must be approved annually by the Board of Directors, ensuring our compliance and for risk mitigation.

The Senior Vice President of Marketing is responsible for ensuring this policy is adhered to by the Marketing Department. Any violations of this policy will be promptly reported to Chief Legal Officer & General Counsel.

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## **Section 8 TRAINING**

The Senior Vice President of Marketing shall coordinate with the Learning Department to ensure appropriate and annual training to new and existing Marketing employees.

- **Annual Review Dates: November 28, 2023; November 29, 2022**
- **BOD Approval/Revision Dates: March 26, 2024; October 31, 2022**
- **Adopted On: January 25, 2022**