BCU

Privacy Policy

Last Updated: April 6, 2023

This Privacy Policy (we refer to it as our "Policy") describes how Baxter Credit Union ("BCU" or "we" or "us") collects, uses, shares, retains, and protects information about you when you (1) visit us at https://www.bcu.org or one of the pages thereon (the "Website"); (2) communicate with us or the Website via email and other electronic messages; (3) open an account on our Website or in-person; (4) apply for a loan; (5) use your credit or debit card; (6) pay your bills; (7) make deposits to or withdrawals from the accounts you have with us; and (8) otherwise interact with us online or offline, such as on the telephone and in written correspondence. We also collect your personal information from others, including credit bureaus or other companies. We adopt this Policy to fulfill our service commitment to you and comply with legal obligations as we process personal information, described below.

This Policy does not apply to information collected or used by any third party, affiliate, or affiliate of a third party, including those that can be accessible via the Website. Please review their policies. BCU is not responsible for the content or the privacy policies or practices of any third-parties, third-party websites, or third-party applications.

Before accessing, using, or interacting with the Website, you should carefully review this Policy together with our <u>Privacy Notice</u>, our <u>Terms of Use</u>, and our <u>Cookies and Pixels Policy</u>, all of which are incorporated by reference and also govern use of the Website. If you are a California resident, please read our <u>Privacy Policy for California Residents</u>. We may change this Policy and Terms of Use from time to time and encourage you to review them whenever you interact with us.

User Consent: By choosing to interact with BCU, including through our Website and by communicating with us via email, telephone or in person, you consent to the collection and use of information as described in this Policy and you represent that you are at least 18 years old. If you are under the age of 18 or you do not consent to the collection, use and/or disclosure of your personal information as set forth in this Policy, please exit and do not use our Website or other applications or services.

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What Personal Information Does BCU Collect?

For purposes of this Policy, unless noted otherwise, when we use the term "personal information," we mean information that identifies, relates to, describes, references, is reasonably capable of being associated with or could reasonably be linked with a particular person or household ("personal information").

We may collect personal information that falls into the following categories:

• Identifiers such as real name, alias, postal address, and email address

- **Customer or User Records** such as name, postal address and telephone number, credit history and credit scores, and in certain instances, account balances and payment history
- **Credit or Debit Card Usage** such as name, credit card and debit card numbers, and general transaction history
- Internet or Network Activity: cookie tracking and pixel tracking

How Does BCU Collect Information About Me?

We collect and store information that you give us directly. For example, when you:

- Open an account
- Apply for a loan
- Pay your bills
- Make deposits or withdrawals from your accounts with us
- Request customer support via our online chat feature or when you reach out to us by phone or email

We also receive and store certain types of information automatically when you interact with us online or with the Website. We have a **Cookie and Pixel Policy** that explains this further.

How Does BCU Use Information About Me?

BCU may use and process information about you, including personal information, for one or more of the legitimate business purposes described in this Policy. For example, BCU (and/or our service providers) may use information about you to:

- Accomplish our underwriting processes related to the insurance services we provide
- Respond to and manage claims made, including processing of payment, bills and insurance applications
- Deliver communications, information or services, and promotions
- Provide support to you and other users
- Present, optimize, and maintain the security of our Website and their contents
- Register, maintain, and provide notifications to you about your Website account
- Detect and prevent fraud or other crimes
- Respond to law enforcement requests and as required by applicable law or court order
- Meet our obligations under the Gramm-Leach-Bliley Act
- Research, test, analyze, and develop our insurance products and services, Website, and services
- Fulfill or meet the reason your information was collected or provided
- Allow you to participate in interactive features on our Website
- Personalize your Website experience and to deliver content, product and service offerings
 relevant to your interests, including targeted offers through our Website, third-party sites, and
 via email or text message (with your consent, where required by law)

Does BCU Share the Information It Receives About Me?

We may share information with third-party service providers with whom we have entered into contracts that require personal information, if any, to be kept confidential and that prohibit the retention, use, or disclosure of personal information for any purpose other than the services specified.

BCU may share or disclose information as described below:

- Within the BCU Family: We may share personal information internally within BCU and with our
 affiliates, unless you have opted-out of our sharing the information. BCU's personnel may have
 access to personal information as needed to provide and operate the Website in the normal
 course of business. This includes the following categories of personal information: identifiers,
 customer or member records, commercial information, internet or other network activity, and
 inferences drawn from personal information.
- Third-Party Service Providers: We employ other companies and individuals to perform functions
 on our behalf, such as sending mail, analyzing data, providing marketing assessments, providing
 analytics information, processing certain payments, and providing data hosting (as specified
 herein). They have access to information needed to perform their functions, but not for other
 purposes. We also use third-party service providers for reporting and similar purposes, but these
 service providers only have access to deidentified data.
- **Business Transfers**: If we purchase other businesses or their assets, sell our business assets, or are involved in a merger, acquisition, reorganization or sale of assets, your information, including any category of personal data collected by BCU, may be among assets sold or transferred and may be subsequently used by a third-party.
- Lawful Requests and Safety: We release personal information when we believe it is required or permitted by applicable law, it is necessary to protect our interests, to prevent fraud or other illegal activity, and to protect the safety of any person. Nothing in this Policy is intended to limit any legal defenses or objections that you may have to a third party's, including a government's, request to disclose your information.
- Aggregated/De-identified information: Collected personal information may be shared or disclosed after it is aggregated and/or deidentified. This means that we remove any details that identify or relate to you personally or could reasonably be linked directly or indirectly with you. We may then share this aggregated and/or deidentified information with third-party providers to help deliver products, services and content that are better tailored to users of our online services and for our own business purposes where permissible under applicable laws and regulations.

How Does BCU Secure Information About Me?

We realize that you trust us to protect your personal information. We take that trust seriously and maintain physical, electronic and procedural safeguards that are consistent with industry standards, to help protect the privacy, accuracy, and reliability of personal information and to protect it from loss, misuse, unauthorized access, disclosure, acquisition, exfiltration, alteration and destruction.

We also take commercially reasonable steps to ensure that our third-party service providers reasonably protect and secure your information. If BCU becomes aware that a third-party service provider is using or disclosing information improperly, we will take necessary and immediate steps to end or correct such improper use or disclosure.

While we attempt to protect the information in our possession, and account for the protection of information provided to our third-party service providers through us, no security system is perfect, and

we cannot promise that information about you will remain secure in all circumstances. Please do your part to help us keep your information secure. You are responsible for maintaining the confidentiality of your password(s) and your account(s), and for all activities that occur under your account(s). BCU specifically reserves the right to terminate your access to your account(s) and any contract you have with BCU related to the use of the Website in the event it learns or suspects you have disclosed your account or password information to an unauthorized third party.

Changes to Our Policy

BCU may modify this Policy from time to time. The most current version of this Policy will govern our use of your information. You may contact us to obtain prior versions of this Policy that we have retained in accordance with our document retention policy. We will notify you of material changes to this policy by posting a notice at the Website or by emailing you at an email address associated with your account, if applicable, and provide an "at a glance" overview of any changes.

Contact for More Information

BCU is located at 340 N. Milwaukee Ave., Attn: Privacy Requests, Vernon Hills, Illinois 60061. Should you have any comments or questions, communication can be directed to BCU's postal address.