

## iTHINK Financial Credit Union ONLINE PRIVACY POLICY

### INTRODUCTION

iTHINK Financial Credit Union ("iTHINK Financial," "Company," "we," "our," or "us") respects your privacy.

This Online Privacy Policy ("Privacy Policy") describes the types of information we may collect from you or that you may provide when you visit or use our [website](#), mobile applications, or other online services (collectively, our "Site"). This policy also describes our practices for collecting, using, maintaining, protecting, and disclosing that information.

If you seek, apply for, or obtain a financial product or service with us, we will use and share that information we collect from or about you in accordance with our [Privacy Notice](#).

Please read this policy carefully to understand our practices regarding your information and how we manage it.

### PERSONAL INFORMATION WE COLLECT

"Personal Information" means information that uniquely identifies, relates to, describes, or is reasonably capable of being associated with or linked to you. The categories of Personal Information we collect may include:

- **Personal Identifiers** – Like your name, mailing address, email address, phone number, date of birth, username and password, and other information that directly identifies you.
- **Account Information** – Like account number, credit/debit card number, account history, account balances, loan details, vehicle or property information, and joint account holders, and other information related to your accounts and applications.
- **Business Information** – Like business-related information (e.g., business name, address, revenue, and industry type), business contact, and professional information.
- **Transaction Information** – Like transaction details when you transfer money to or from your accounts, third party billing information or statements, credit/debit card purchases, payment or transaction history, and payment card details.
- **Credit Report Information** – Like your credit score, credit history, and other information that we receive from credit reporting agencies.
- **Demographic Information** – Like gender, marital status, age, citizenship, household size/composition, education information, income, occupation, veteran or military status, and employment status.
- **Geolocation Information** – Like internet protocol address, device location, and any information used to identify your physical location.
- **Device Information** – Like your device type, web browser type and version, operating system type and version, display/screen settings, language preferences, device contacts (e.g., to facilitate payments), photos (e.g., to deposit checks), mobile network information, general location (e.g., city, state, or country), precise location (e.g., latitude/longitude to find a nearby branch or ATM), cookie IDs, device IDs, mobile advertising IDs, and likely connections among different browsers and devices that you use.

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- **Online/Mobile Activity Information** – Like login data, communication preferences, search history, information about how you use and interact with our Site (including content viewed, links clicked, and features used), when and how often you use our Site, and the webpage from where you were directed to our Site.
- **Marketing Information** – Like your marketing preferences, information about products or services, and inferences based on your interactions with us or our partners (e.g., Online/Mobile Activity Data used for targeted advertising).
- **Communication Information** – Like Personal Information contained within your communications with us via email, social media, chat functionality, or otherwise, and in certain cases we may use third-party service providers to do so. Where permitted by applicable law, we may collect and maintain records of calls and chats with our agents, representatives, or employees via message, chat, or similar functionality.

If you inquire about or apply for a job at iTHINK Financial Credit Union through our Site, we or an authorized third party may also collect:

- **Employment Application Information** – Like professional, employment-related, and education history collected through the Site about job applicants, employees, associates, contractors, or other members of our workforce.

## HOW WE COLLECT PERSONAL INFORMATION

We collect information from and about users of our Site, including Personal Information you provide to us directly through submitted forms or accessed accounts, information collected automatically when you interact with the Site, and Personal Information we receive from third parties and service providers that support account servicing, fraud prevention, analytics, marketing, application processing, security, and related business operations. As you interact with our Site, we may also use cookies and similar tracking technologies to collect Personal Information automatically as you navigate our Site. For additional information regarding our use of these technologies, see the *Cookies and Tracking Technologies* section below.

## HOW WE USE YOUR PERSONAL INFORMATION

We use information that we collect about you or that you provide to us for various purposes, depending on how you interact with us, including, but not limited to:

- **Providing Products and Services** – evaluating your applications for our products and services, managing your accounts, offering customer support, communicating with you, and providing online tools.
- **Identity Verification and Fraud Prevention** – verifying your identity when you apply for products or services, authenticating your login credentials, confirming your location to grant access to your accounts, storing security questions for future verification, assessing fraud risk, and detecting fraudulent transactions.
- **Security** – monitoring network logs, detecting incidents, conducting investigations, and protecting against malicious activities.
- **Advertising** – sending you offers, displaying online ads, targeting offers or promotions, providing sweepstakes, conducting market research, and improving our marketing.
- **Analytics** – analyzing website usage, performance, mobile application features, user interface and experience, feature testing, and debugging.

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- **Improving Products and Services** – personalizing and optimizing website experiences, recognizing users across devices and browsers, enhancing existing products and services, and developing new ones.
- **Legal and Business Purposes** – complying with laws, responding to lawsuits and investigations, defending legal claims, exercising our rights (including for collections on delinquent accounts), resolving disputes, conducting credit risk analysis and reporting, performing compliance and institutional risk control activities, and overall business operations, including as part of a corporate transaction such as the sale of part or all of our assets or business, the acquisition of part or all of another business, or another corporate transaction, including bankruptcy.
- **Other** – to fulfill any other purpose for which you provide it, including purposes described when you provide the information or give your consent.
- **Aggregating or Deidentifying Information** – using or modifying information to prevent identification of you, for example, compiling aggregated statistics to understand trends or feature usage. Aggregated and de-identified data is not subject to this Online Privacy Policy.

If you are applying for employment with us, we also use Personal Information to process your job application, to verify the information you have provided in your application, conduct interviews, perform background and reference checks, to communicate with you and answer your questions, to confirm your eligibility for employment, and improve our recruiting processes. We may also save your Personal Information for future employment opportunities with us.

## DISCLOSURE OF YOUR PERSONAL INFORMATION

We may disclose personal information that we collect, or you provide, as follows:

- **Affiliates and Acquisitions** – We may share information with our affiliates to deliver products and services and for other business purposes as stated in our [Privacy Notice](#). If we are to be acquired by or merged with another company, we will share information with the acquiring or merging company, including during negotiations.
- **Business Partners** – We may share information with companies that we have partnered with to offer or enhance products and services.
- **Advertising Providers** – We may allow companies to collect information through our Site to provide us with advertising services, including targeted or behavioral advertising.
- **Service Providers** – We may share your information with service providers who assist us with website administration, surveys, technical support, payment processing, or service fulfillment, or to fulfill your request for their services.
- **Credit Reporting Agencies** – We share information with credit reporting agencies like Experian, Transunion, and Equifax to report or learn about your financial history and for other lawful purposes.
- **Legal Obligations** – We may disclose information to government authorities or law enforcement due to legal requirements, such as subpoenas, warrants, court orders, or other legal processes. Information may also be shared to establish or exercise our rights, defend against legal claims, investigate illegal activities, suspected fraud, safety issues, or policy violations.
- **Other Third Parties with Your Consent** – We may disclose your information to third parties with your consent. For example, you might authorize third parties to access your information for financial services like account aggregation, payments, or tax preparation. Their privacy policies govern the use of your data. We may block third party access without notice for security reasons.

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

## COOKIES AND OTHER TRACKING TECHNOLOGIES

We and our service providers may use cookies and similar technologies to collect usage and browser information about how you use our Site. The technologies we use for this automatic data collection may include cookies and web beacons that permit us to verify system and server integrity and generate statistics around the popularity of certain content. We process the information collected through such technologies, which may include or be combined with Personal Information, to help operate certain features of our Site, to enhance your experience through personalization, and to help us better understand the features of our Site that you and other users are most interested in.

*Website Delivery and Appearance* – We may use third-party providers to enable certain customer interaction opportunities, content delivery (like audio or video), or other service capabilities. Examples include, but are not limited to, the following functionality:

- **Content Delivery:** We partner with service providers to host our Site and deliver specific content in support of our services. For example, we partner with companies like YouTube to deliver specific content delivery like audio and video. For more information about how YouTube collects and uses your data, visit [Google's Privacy Policy](#).
- **Chat-Based Support:** We use a chat feature powered by a third-party service provider to provide customer service and technical support through our Site. When you use the chat feature, we may automatically collect and share certain information, such as personal identifiers, usage information, and the content of your chat messages, with the vendor to operate the chat tool and respond to your inquiries. Please note that this feature uses an automated chatbot and automated responses, and you are not communicating with a live representative.

*Website Analytics* – We use analytics services that use cookies and other technologies that collect your Personal Information, to assist us with analyzing our Site traffic and site usage to optimize, maintain, and secure our Site and inform subsequent business decisions (including, e.g., advertising). These include, but are not limited to, Google Analytics. To learn more about how Google uses data, visit [Google's Privacy Policy](#) and Google's page on "[How Google uses data from sites or apps that use our services](#)." You may download the [Google Analytics Opt-out Browser Add-on](#) for each web browser you use, but this does not prevent the use of other analytics tools. To learn more about Google Analytics cookies, visit [Google Analytics Cookie Usage on Websites](#).

*Interest-Based Advertising* – We may also allow or enable third parties to collect Personal Information to provide their interest-based advertising on behalf of our products and services, or their own. Interest-based advertising occurs when advertisements are shown to you based on information collected from your online interactions over time and across multiple websites, devices, or online services that you visit or use. Some companies may engage in cross-context behavioral advertising to predict your preferences and show you advertisements that are most likely to be of interest or relevant to you.

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We do not control these third parties' collection or use of your information for these purposes, or the opt-out options they may individually offer you via their terms, conditions, and privacy policies. If you have any questions about an advertisement or other targeted content, you should contact the applicable provider directly. Examples of the third-party service providers we engage to serve interest-based advertisements include Google Ads (including Google Syndication), Beeswax, and TVSquared.

*Cookie Choices* – To manage your preferences with respect to these technologies, you can:

- Change your cookie preferences by using the cookie banner on our Site or by customizing your browser settings to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable certain cookies, please note that some parts of our Site may not function properly. These settings may be lost and require reconfiguration if you delete your cookies.
- Block the collection and use of your information by online platforms and ad tech companies for the purpose of serving interest-based advertising by visiting the opt out pages of the self-regulatory programs of which those companies are members: [National Advertising Initiative](#) and [Digital Advertising Alliance](#). Please note that even if you opt out of interest-based advertising, you may still see "contextual" ads which are based on the context of what you are looking at on the websites and pages you visit.
- Review and execute any provider-specific instructions to customize your preferences or opt-out of certain processing, including interest-based advertising, by third-party service providers. For example, to opt-out of this type of advertising by Google, customize your ad preferences, or limit Google's collection or use of your data, visit [Google's Safety Center](#) and [Google's Ad Settings](#) and follow [Google's personalized ad opt-out instructions](#).

## **HOW LONG WE KEEP YOUR PERSONAL INFORMATION**

We retain your Personal Information for as long as needed: (i) to provide our services to you; (ii) fulfill the purposes outlined in this Privacy Policy; and (iii) to comply with our legal obligations, resolve disputes, and enforce any agreements. Criteria we will use to determine how long to retain your Personal Information include the nature and length of our relationship with you; our legal rights, obligations, and retention requirements; and if we have an ongoing business purpose for retaining your Personal Information, such as communicating with you about ongoing or prospective services you requested.

## **DATA SECURITY**

We have implemented commercially reasonable measures designed to protect your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. 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 Site.

## **LINKS TO THIRD-PARTY WEBSITES**

We are not responsible for the practices employed by any websites or services linked to or from our Site, including the information or content contained within them. We encourage

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you to investigate and ask questions before disclosing Personal Information to third parties, since any Personal Information disclosed will be handled in accordance with the applicable third party's privacy policy.

We have official pages on social media platforms like Instagram, Meta/Facebook, Pinterest, YouTube, and LinkedIn. Any content you post via these social media pages is subject to the Terms of Use and Privacy Policies for those platforms.

Posts on our social media pages – including pictures, comments, suggestions, or complaints – are visible to other users. Avoid sharing sensitive personal or confidential information in your posts. Please review the privacy policies of our social media partners when using those platforms.

## **INTERNATIONAL USE**

If you are visiting our Site from outside of the United States, please note that our Site is hosted in the United States. Where permitted by applicable law, we may transfer the Personal Information we collect about you to the United States and other jurisdictions that may not be deemed to provide the same level of data protection as your home country, as necessary for the purposes set out in this Privacy Policy.

## **CHILDREN'S PRIVACY**

Our Site is not directed to children under thirteen, and we do not knowingly collect personal information online from children under thirteen without appropriate consent where required by law. If we learn that we have collected Personal Information from a child, we will promptly take steps to delete that information. If you believe we might have any information from or about a child, please contact us at [compliance@ithinkfi.org](mailto:compliance@ithinkfi.org).

## **CHANGES TO THIS POLICY**

We may update this Privacy Policy from time to time. When we do, we will post the revised version on our Site and update the "Last Updated" date above. We may provide additional notice where required by law. Your continued use of the Site after any such changes is deemed acceptance of the revised Privacy Policy.

## **CONTACT US**

If you have questions about this Privacy Policy, please contact:

iTHINK Financial Credit Union  
Compliance Department  
1000 NW 17<sup>th</sup> Avenue  
Delray Beach, FL, 33445  
[compliance@ithinkfi.org](mailto:compliance@ithinkfi.org)  
(800) 873-5100