IHMVCU ONLINE AND MOBILE PRIVACY POLICY

Last Modified: June 18, 2025 Last Reviewed: June 18, 2025

We at I.H. Mississippi Valley Credit Union (referred to as "IHMVCU," "we," "us," or "our") respect your privacy and are committed to protecting it. This policy describes the types of information we may collect from you or that you may provide to us, and our practices for collecting, using, protecting, and disclosing that information.

This policy applies to information we collect:

- On this website, our mobile sites, and through our mobile applications (our "Sites").
- In email and other electronic messages with you.
- When you interact with our advertising and applications on third-party websites, services, and social media.

It does not apply to information collected by:

- Us offline or through any other means, except when combined with other information subject to this Policy; or
- Any third party, including through any application or content that may link to or be accessible from our Sites.

If you are a U.S. consumer and have a financial product or service with us, we will use and share any information that we collect from or about you in providing that product or service in accordance with **Our Privacy Notice** available here. In the event of any inconsistency between this Online and Mobile Privacy Policy and Our Privacy Notice, the terms and conditions of Our Privacy Notice will control.

Our Sites are not intended for use by persons located within the European Economic Area (EEA). We do not knowingly request or accept personal information concerning or supplied by persons who are located within the EEA at the time they access our Sites. If you have accessed our Site from within the EEA, you should immediately discontinue your use. If you have supplied personal information to us in violation of this provision, whether through the registration of new user accounts or otherwise, please contact us at memberservices@ihmvcu.org.

Please read this policy carefully to understand our policies and practices regarding your information, how we will treat it, and your rights. By using our Sites or by providing us information, you agree to this Privacy Policy. You can access the specific topics in this Privacy Policy by clicking the relevant linked below:

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Types of Information We Collect

Information Automatically Gathered About Our Visitors: We collect aggregate and user-specific information on which pages users access or visit. This information is used to generate reports that help us assess the value of an interest in the various Sites and services we provide. We use the information we collect to improve the content of our Sites and services. We can build better Sites and provide better services if we know which pages our users are visiting, how often they visit and how long they stay on a page. The following provides examples of the type of information that we collect from you and how we use that information.

Context	Types of Information	Primary Purpose for Collection and Use
Precise Geolocation	We may collect your location from the GPS, Wi-Fi, and/or cellular technology in your device, with your consent.	We use this information to engage in behavior-based advertising and capture Site analytics.
Email Interconnectivity	If you receive email from us, we use tools to capture data related to when you open our message or click on any links or banners it contains.	We use this information to understand how you interact with our communications to you.
Website interactions	We use technology, including electronic files called pixels or web beacons, to monitor how you interact with our Sites. This includes which pages you visit, which links you click on, or information that you type into our online forms.	We use this information to understand how you interact with our Sites to better improve it, and to understand your preferences and interests to select offerings that you might find most useful. We also use this information to detect and prevent fraud.
Web logs	We collect information about your internet connection, the device and browser you use to access our Sites, mobile carrier name and line type, device identifiers, and usage details (such as date and time of your device's access to our services, information	We use this information to monitor our networks, provide and maintain the functionality of our Sites; and to investigate, prevent, or take action regarding possible malicious, deceptive, fraudulent, or illegal activity, including attempts to

Context	Types of Information	Primary Purpose for Collection and Use
	downloaded and presented through the app), IP addresses, precise physical location (geolocation), times and dates of visits to the Sites, and information about the site you came from, the parts of our services you access, the specific videos and other content you request or view, and the site you visit next.	manipulate or violate our policies, procedures, and terms and conditions.
Third-Party Cross- Site Tracking	We participate in behavior-based advertising, which means that a third-party uses technology (e.g., a cookie) to collect information about your use of our Site so that they can provide advertising about products and services tailored to your interests on our Site, or on other websites.	We use this information to engage in behavior-based advertising and capture Site analytics.

Information Gathered by Voluntary Submission: To make use of certain features on our Sites, visitors need to register and to provide certain information as part of the registration process. Supplying such information is entirely voluntary, but if you do not supply the information we need, we may be unable to provide you with services and other Site content. The following provides examples of the type of information that we collect from you and how we use that information.

Context	Types of Information	Primary Purpose for Collection and Use
Account Registration	We collect your name, contact information, and other personal information when you create an account to use our Sites. We also collect information relating to the actions that you perform while logged into your account.	We use this information to provide account-related functionalities to our users, including account creation and maintenance, and to provide the relevant services to you.
Account Service Information	We collect Information that is necessary to deliver services to you, including your account numbers, payment card information, tax identification numbers, driver's license numbers (or comparable), account balances, payment history, transactions, account PINs, security questions and words,	We use this information to provide account-related functionalities to our users, including account creation and maintenance, and to

Context	Types of Information	Primary Purpose for Collection and Use
	signatures, education, employment history, criminal history, family and dependents, income, credit history, credit scores, and creditworthiness.	provide the relevant services to you.
Automated Account Services	We collect your name and contact information, including e-mail address, if you sign up for any of our automated account services.	We use this information to provide transactional e-mails regarding your account and use of our services.
Feedback/Support	If you provide us feedback or contact us for support we will collect your name and e-mail address, as well as any other content that you send to us, in order to reply.	We use this information to receive, and act upon, your feedback or issues, such as to develop new ways to meet our members' needs and to grow our business.
Partner Promotion	We collect information that you provide as part of a co-branded promotion with another company.	We use this information in fulfilling our promotions.
Surveys	When you participate in a survey, we collect information that you provide through the survey. If the survey is provided by a third-party service provider, the third party's privacy policy applies to the collection, use, and disclosure of your information.	We use this information to understand your opinions, conduct analytics to improve our products or services, and collect information relevant to our organization.
Inferences	We may draw inferences based on the information identified in this section.	We use this information to provide you more personalized services.

In addition to the information that we collect from you directly, we may also receive information about you from other sources, including third parties, business partners, our affiliates, or publicly available sources.

Use And Processing Of Information

In addition to the purposes and uses described above, we use information in the following ways:

- To identify you when you visit our Sites.
- To provide you with information, products, or services that you request from us, including to verify your identity, process your applications and transactions, and maintain the account(s) you have with us.
- To improve our Sites, services, and offerings.

- To prevent fraud and enhance the security of your account or our services.
- To conduct statistical, marketing and demographic analyses of our Site visitors.
- To respond to inquiries related to support, employment opportunities, or other requests.
- To deliver content and product and service offerings relevant to your interests, including offers or ads through our Sites or our partners, and via email or text messages with your consent.
- To comply with and enforce applicable legal requirements, relevant industry standards, contractual obligations, and our policies.
- To notify you about changes to our Sites or our policies.
- To fulfill any other purpose for which you provide it.
- In any other way we may describe when you provide the information.

Although the sections above describe our primary purpose in collecting your information, in many situations we have more than one purpose. As a result, our collection and processing of your information is based in different contexts upon your consent, our need to provide the service you requested, our obligations under law, and/or our legitimate interest in conducting our business.

Messages from Us

Upon registering with our services, you may begin receiving communications from us. If you have signed up for any of our automated account services, you may receive transactional emails, text messages, or push notifications regarding the status of your account, confirmations, notices of expiration and renewal and other related electronic correspondence. To stop receiving push notifications, please adjust the settings on your smart phone, tablet, or other device. You may stop receiving emails and text messages by following the "Unsubscribe" or "Stop" instructions located near the bottom of each message; however, we will still communicate with you in connection with servicing your account, fulfilling your request, or about any promotion, service, or program in which you have elected to participate.

Disclosure of Your Information

We may disclose aggregated information about our users, and any information that does not identify an individual, without restriction. We may disclose personal information that we collect or you provide as described in this privacy policy:

- **Affiliates.** To our subsidiaries and affiliates for their everyday business purposes and for their marketing of products or services to you, as further described in our Privacy Notice available here.
- **Service Providers.** To contractors, financial service providers, and other third parties we use to support our business and provide services to you.
- Acquisitions. To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of IHMVCU's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by IHMVCU about our users is among the assets transferred.
- **Promotions.** To non-financial third parties to offer our products or services to you, and to non-financial third parties to market their products or services to you if you have not opted out of these disclosures.
- Other Disclosures with Your Consent. We may ask if you would like us to disclose your information to other unaffiliated third parties who are not described elsewhere in this Privacy Policy.
- Other Disclosures without Your Consent. We may disclose information in response to subpoenas, warrants,

- or court orders, or in connection with any legal process, or to comply with relevant laws. We may make these disclosures to respond to any government or regulatory request and to report to credit bureaus.
- Our Rights. We may also disclose your information in order to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies.

Third Party Use of Tracking Technologies

The technologies we use for this automatic data collection may include:

- Cookies. We and third-party vendors, including Google, Meta (Facebook/Instagram), Twitter, TikTok, YouTube, and Medallia, may use first-party cookies (such as the Google Analytics and Meta Pixel cookies) and third-party cookies (such as the AdWords & DoubleClick cookie) to inform, optimize, and serve advertising based on visits to our website; and to report how our advertising impressions, other uses of advertising services, and interactions with these advertising impressions and advertising services are related to visits to our site. A cookie is a small file placed on the hard drive of your computer or mobile device. You may refuse to accept cookies by activating the appropriate setting on your Internet browser or adjusting your privacy settings. However, if you select to decline cookies you may be unable to access certain parts of our Sites. Unless you have adjusted your browser settings so that it will refuse cookies, our system will issue cookies when you direct your browser to our Sites. For more information, http://optout.networkadvertising.org
- Flash Cookies. Certain features of our Sites may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Sites. Flash cookies are not managed by the same browser settings as are used for browser cookies.
- Clear GIFs, Pixel Tags, and Web Beacons. Pages of our Sites and our e-mails may contain small electronic files, typically a one-pixel transparent image located on a webpage or email, that permit IHMVCU to count users who have visited those pages or opened an email and for other related website statistics purposes (for example, recording the popularity of certain website content and verifying system and server integrity).
- Google Analytics. We use data from Google's Interest-based advertising or 3rd-party audience data (such
 as age, gender, and interests) with Google Analytics to serve more relevant advertising experiences across
 the web based on previous visits to our website. Our Sites use the following Google Analytics features based
 on Display Advertising: Remarketing, Google Display Network Impression Reporting, and Google Analytics
 Demographics and Interest Reporting. We utilize these services to serve more relevant advertising
 experiences across the web based on previous visits to our website.

Some content or applications, including advertisements, on the Sites are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers such as Amazon, Google, and Meta (Facebook/Instagram). These third parties may use cookies, alone or in conjunction with web beacons or other tracking technologies, to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content. We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us and have created mechanisms to provide you with control over your information as described in this Privacy Policy. Please note that some of the rights described below may not be available to you or may vary depending on your state of residence.

- Promotional Emails. You may choose to provide us with your email address for the purpose of allowing us
 to send surveys and promotional materials to you, as well as targeted offers from third parties. You can stop
 receiving promotional emails by following the unsubscribe instructions in emails that you receive. If you
 decide not to receive promotional emails, we may still send you service-related communications.
- Promotional Text Messages. If you receive a text message from us that contains promotional information
 you can opt-out of receiving future text messages by replying "STOP" or following the provided instructions.
- Access To Your Personal Information. You have the right to request access to personal information we hold
 about you. Specifically, you have the right to request access to information about the categories of personal
 information concerned and categories of recipients to whom the personal information has been or will be
 disclosed, and the sources from which we receive that personal information among other information. You
 generally have the right to receive this personal information, in a structured, commonly used, and machinereadable format so you can transmit this personal information to another entity.
- Changes/ Corrections To Your Personal Information. We rely on you to update and correct your personal
 information. Note that we may keep certain information in our backup files as permitted or required by law.
 If our Site does not permit you to update or correct certain information contact us at the address described
 below.
- Deletion Of Your Personal Information. Typically, we retain your personal information for the period
 necessary to fulfill the purposes outlined in this policy, unless a longer retention period is required or
 permitted by law. You may, however, request information about how long we keep a specific type of
 information, or request that we delete your personal information by contacting us at the address described
 below. In addition, we may keep your personal information as needed to comply with our legal obligations,
 resolve disputes, and/or enforce any of our agreements.
- Cookies and Tracking Technologies. Our use of cookies or other tracking technologies may be considered "targeted advertising" or deemed a "sale" or "share" under applicable law in some states. If you would like to opt out of future use of these technologies for targeted advertising, please click on the "Open Cookie Settings" button at the bottom of our Site and selecting to Opt-Out of "Marketing Cookies" or all non-essential cookies. You may also adjust your browser or app settings to refuse all or some cookies, or to alert you when cookies are being sent. However, please note our Sites are not configured to respond to "Do Not Track" or other universal opt-out settings. If you previously gave consent to these uses and wish to withdraw that consent, please contact us as described below.
- **Promotional Offers from IHMVCU.** If you do not wish to have your information used by IHMVCU to promote our own services, you can opt-out by using the Mail-In Form in Our Privacy Notice available here.
- **Disclosure of Your Information for Third-Party Advertising.** If you do not want us to share your personal information with unaffiliated or non-agent third parties for promotional purposes, you can opt-out by using the Mail-In Form in Our Privacy Notice available here.
- Geolocation Data. Our mobile banking app periodically collects, transmits, and uses geolocation
 information, including precise geolocation data, but only if you expressly authorize collection of such
 information. You may choose whether geolocation information can be monitored on a continuous basis in
 the background, only while the app is being used, or not at all. You can change your location permissions at
 any time in your device settings.
- **Connectivity and Usage Data.** You cannot opt out of our sharing of non-personal and connectivity information such as aggregate data, anonymized data, IP addresses, and device identifiers.
- Objection to Processing or Revocation Of Consent. In certain circumstances, you may object to processing
 of your personal information. If you revoke your consent for the processing of personal information then we

may no longer be able to provide you services. In some cases, we may limit or deny your request to revoke consent if the law permits or requires us to do so, or if we are unable to adequately verify your identity. You may revoke consent to processing (where such processing is based upon consent) by contacting us at the address described below.

- Right to Consent to or Limit the Use of Your Sensitive Personal Information. You have the right to consent
 to the processing of your sensitive personal information, including but not limited to precise geolocation
 data. Separately, you may have the right to instruct us to limit the use and disclosure of your sensitive
 personal information to only that which is necessary to perform the services or provide the goods reasonably
 expected by an average consumer or for specific business purposes defined by law.
- Non-discrimination We do not discriminate against visitors or consumers who exercise any of their rights
 described in this Privacy Policy, nor do we retaliate against employees who exercise these rights. However,
 we may require the use of your personal information to provide access to our Sites and services. Therefore,
 when you exercise your deletion right, in particular, as well as other rights, you may lose access to certain
 aspects of the services that require your personal information.

Accessing and Correcting Your Information

Our use of your data is based upon consents obtained at the time you access our Sites or provide information to us; by our legitimate business interests in marketing and providing goods and services; by contracts entered by you, including our Terms of Use, or contracts with our business partners and vendors that supply the data; and by our compliance with law. You may request to review, correct, or delete data maintained by IHMVCU, or object to our processing or use of your data, by contacting us at the address below. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

You can review and change the personal information associated with your registered account by logging into the Site and visiting your account profile page.

Changes to Our Privacy Policy

This policy may change from time to time. It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat your personal information, we will notify you by email and through a notice on our home page at www.ihmvcu.org.

The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our home page and this privacy policy to check for any changes. Your continued use after we make changes is deemed to be acceptance of those changes.

Children Under the Age of 16

With the exception of the Balance Builder Junior Savers program, our Sites are not intended for children under 16 years of age. We do not knowingly collect personal information from children under 16 without parental consent. No one under age 16 may provide any personal information to or on the Sites. If you are under 16, do not use or provide any information on our Sites or through any of their features, register on the Sites, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or username you may use. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please immediately contact us at the email address or phone number below.

Territory

Please be aware that your personal information and communications may be transferred to and maintained on servers or databases located outside your state, province, or country. If you are located outside of the United States, please be advised that we process and store information in the United States. The laws in the United States may not be as protective of your privacy as those in your location. By using our Site, you are agreeing to the collection, use, transfer, and disclosure of your personal information and communications will be governed by the applicable laws in the United States and as described in this policy.

Third Party Sites

We are not responsible for the content, practices, or policies of any other party or any non-IHMVCU website you visit, including any social media sites in which we display information, or any website whose link appears within our website, and regardless of any affiliation we may share with any other entity. Before providing any personal or identifiable information, you should first review the policies of any website you are visiting. The fact that there is a link between our website and that of another website does not represent an endorsement by us of the content and any product, service, or program contained on any other website. Advertising we place on other websites may contain a "tag," which is a code that tells us that our advertisement was reviewed at the sponsoring website.

Data Security

To protect your personal information from unauthorized access and use, we maintain physical, electronic, and procedural safeguards, including but not limited to security measures that comply with applicable federal and state laws. We also require our service providers and business partners to whom we disclose personal information to do the same. When you enter sensitive information (such as a debit or credit card number) into the Sites, we encrypt the transmission of that information using secure socket layer technology (SSL). We may retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Sites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

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 Sites. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Sites.

Contact Us

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

IH Mississippi Valley Credit Union P.O. Box 1010 Moline, IL 61266-1010 Phone: 309-793-6200

Email: memberservices@ihmvcu.org

www.ihmvcu.org

Read our Privacy Notice accessible <u>here.</u>