

HOMELAND CREDIT UNION DIGITAL BANKING PRIVACY NOTICE

This Digital Banking Privacy Notice (this “Notice”) applies to your interactions with our websites, digital banking platform and mobile applications (collectively, “Digital Banking”) through your computer, smartphone, tablet, mobile device, or other communications device (each, a “Communication Device”) and describes what personal information we collect, how we collect it, and how we may share and use it. By using Digital Banking or any of the services available through Digital Banking (collectively, “Digital Services”), you consent to this Notice, including to our use and disclosure of your personal information in the manner described in this Notice.

Our general Privacy Notice (the “General Privacy Notice”) applies to members described therein, in addition to the terms of this Notice, and may be found on our homelandcu.com website.

Definitions

The term “we”, “us” and “our” refer to Homeland Credit Union

“Affiliates” means companies related by common ownership or control. They can be financial and nonfinancial companies. Homeland Credit Union has no affiliates.

“Joint Marketing” means a formal agreement between nonaffiliated financial companies that together market financial products or services to you. Our joint marketing partners include insurance companies, credit card companies, mortgage services, and brokerage firms.

“Nonaffiliates” means companies not related by common ownership or control. They can be financial and nonfinancial companies. We do not share your personal information with Nonaffiliates so they cannot market to you.

Personal Information We Collect Online

How do we collect personal information online?

We may collect personal information about you online:

- That you provide to us, such as when you login to, visit, or use Digital Banking, on applications you complete, and when you use our products and services;
- That we obtain from third parties, such as service providers and credit bureaus, or from publicly available sources;
- Through your Communication Device, such as by use of cookies, web beacons, click stream auditing or other tracking technologies;
- When you apply for or open a new account;
- When you register for a new product or service;
- When you request information from us.

What types of personal information do we collect online?

The types of personal information we may collect about you online depends on the product or services you have with us, but may include:

- Contact information, such as name, address, email address, and phone number;
- Account application information, such as credit, employment details, and income;
- Identifiers, such as social security number, account numbers, driver's license numbers, or other information that identifies you;
- Access authorization, such as user ID, PIN, passwords, and security questions and answers;
- Access to camera device, such as for identity verification, mobile deposit, and mobile deposit captures;
- Debit/credit card information, such as card number, expiration date, CVV2, and billing address or zip code;
- Financial information, such as transaction history, account balances, payment details and history, credit history, and checking account information;
- Information from your Communication Device, such as:
 - o Unique device identifiers and IP addresses;
 - o Browser type, version, language, and display/screen settings;
 - o Information about how you interact with Digital Banking;
 - o Communications data, such as your preferences and content;
 - o Responses to advertisements on Digital Banking;
 - o Search and voice to text queries in Digital Banking;
 - o Search engine referrals;
 - o Geolocation information, such as for real time ATM or financial center location or for fraud prevention. Some features may not function unless you have enabled access to your location data;
 - o Browsing history and search history.

How long do we retain your personal information?

We retain your personal information as long as necessary to provide the products and services for which the information was collected and as required by law and regulation. Upon expiration of the necessary retention period, your personal information is destroyed in a manner that renders it unusable and incapable of further retention.

How We Use and Share Personal Information

How do we use your personal information?

Personal information collected from you online may be used in various ways, including:

- Delivering products to you and performing services for you;
- Personalizing your Digital Banking experience;
- Processing transactions and applications;
- Verifying your identity;
- Managing your preferences;
- Performing accounting, auditing, and other internal functions;
- Advertising products and services;

- Detecting, preventing, and investigating security breaches and fraud;
- Performing analytics on your use of Digital Banking and conducting customer research;
- Complying with applicable legal requirements, industry standards, contractual obligations, and our internal practices and policies;
- Permitting your use of Services and features of Digital Banking;
- Communicating with you or providing notice to you about our products, services, and promotional offers;
- For any other purpose we disclose at the time we collect such information.

With whom do we share your personal information?

We may share your personal information we collect from you online:

- For our everyday business purposes, such as the following. You may not limit this sharing:
 - o To process your transactions and maintain your accounts;
 - o Respond to court orders, subpoenas, legal investigations, and government agency requests;
 - o Report to credit bureaus;
 - o With third-party providers who perform Digital Banking functions or provide Services;
 - o To enforce our terms and conditions;
 - o To address fraud, security, or technical issues;
 - o To respond to an emergency.
- For our marketing purposes to offer our products and services to you. You may not limit this sharing.
- For joint marketing with other financial companies. You may not limit this sharing.
- For our Affiliates' everyday business purposes, such as information about your transactions and experiences. We do not share.
- For our Affiliates' everyday business purposes, such as information about your creditworthiness. We do not share.
- For our Affiliates to market to you. We do not share.

We do not share any of your personal information with Nonaffiliates to market to you.

No personal information gathered during the SMS opt in process will be shared or sold with any third parties, specifically with promotional aims.

As applicable, please see the General Privacy Notice referenced above for more information on who we may share information with and whether you may limit such sharing.

How can you limit sharing?

To limit our sharing, you may: Call 740-775-331 or email us at info@homelandcu.com

Security

We use reasonable safeguards that comply with legal and regulatory standards to protect and limit access to your personal information including computer safeguards and secured files and buildings. Information you send to us electronically may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels to transmit confidential information to us. No method of transmitting or storing data is guaranteed to be secure. If you have reason to believe that your interaction with us is no longer secure, please notify us immediately by contacting us as described below in “Questions”.

Understanding Cookies and Other Tracking Technologies

We use business intelligence tools to track, monitor, and report on user activities and usage to help improve the banking experience, product offerings, and preferences. Some of these tracking tools may detect characteristics or settings of the Communication Device you use to access Digital Banking. Cookies or other similar tracking technologies may be used to gather information on Digital Banking. Cookies are electronic files that your internet browser places on your hard drive or other Communication Device to retain information relating to your visits to and use of Digital Banking. We may use cookies to improve the functionality and performance of Digital Banking, for fraud prevention, or for advertising and marketing purposes. Cookies may also help us customize your Digital Banking experience. Most web browsers allow you to adjust your settings to decline or delete cookies, but doing so may impair your Digital Banking experience.

Children

Digital Banking is not intended for children under 13 years of age. We do not knowingly collect personal information from children under 13 years of age without parental consent and we comply with the practices established under the Children’s Online Privacy Protection Act.

Linking to Other Sites

We may provide links to third-party provider sites. You should review all such third-party providers’ terms and conditions and privacy and security policies, which may differ from ours. We are not responsible for the privacy or security of such third-party providers’ sites.

Changes to this Notice

This Notice is subject to change. Any updates or changes to this Notice will be posted on this website with the new revision date, which is the effective date of changes. Your continued use of Digital Banking constitutes your acceptance of any changes to this Notice.

Questions

Call 740-775-3331 or go to homelandcu.com for a complete listing of branch phone numbers.