



**United Heritage**  
Credit Union

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**Internet Privacy Statement for United Heritage Credit Union**

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## PRIVACY NOTICE

**Effective:** November 29, 2022

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### **1. OVERVIEW**

United Heritage Credit Union and United Heritage Charity Foundation (collectively “UHCU,” “we,” “us,” “our”) respects your privacy and is committed to protecting the personal data we hold about you. If you have questions, comments, or concerns about this Privacy Notice or our processing of personal data, please see the bottom of this Privacy Notice for information about how to contact us.

This Privacy Notice explains our practices with respect to personal data we collect and process about you. This includes information we collect through, or in association with, our websites with a home page located at [www.uhcu.org](http://www.uhcu.org), our mobile apps, our products and services that we may offer from time to time via our website and/or related apps, or otherwise through your interactions with us (websites, apps, products, and services, collectively, the “Services”).

*Please review the following to understand how we process and safeguard personal data about you. By using any of our Services, whether by visiting our websites or otherwise, and/or by voluntarily providing personal data to us, you acknowledge that you have read and understand the practices contained in this Privacy Notice. This Privacy Notice may be revised from time to time, so please ensure that you check this Privacy Notice periodically to remain fully informed.*

### **2. PERSONAL DATA WE COLLECT**

We collect personal data from and about you through the Services, including:

- **Directly from you.** We collect personal data from you when you provide it to us, including, but not limited to, through applying for membership and creating an account, enrolling in online banking, submitting a loan application, paying bills, transferring funds internally and externally, viewing statements, depositing checks, activating/deactivating a debit card, updating your account information, placing an order, entering a contest, or contacting us with questions or comments. For example, when you create an account with us, you are required to provide your thirteen (13) digit account number, last name, social security number, zip code, email address, and requested username. We also collect your financial account information when you make online payments through the website using the SWBC portal, Bacon Loan Pay.
- **Automatically or indirectly from you.** When you use the Services, we utilize commonly-used logging and analytics tools, including, but not limited to Google Analytics, Marketo, Facebook, MarchEX, Bizible, Q2 and Q2 Smart, to collect information about your device, the network used to access the Services, for fraud protection, and information about your use of the Services (such as how you navigate and move around the Services).

We also use certain technologies on the Services, including cookies and pixel tags, that allow us, our service providers, and other third parties to store information locally on your device, identify your device, track your interactions with messages we send, and track activity over time and across websites.

Information collected automatically includes the software and hardware attributes of the device you use to access the Services, unique device ID information, regional and language settings, performance data about the Services, network provider, and IP address (a number assigned to your device when you use the Internet). In addition, information is collected passively in the form of log files and third-party analytics (including Google Analytics) that record website activity. For example, log file entries and analytics data are generated every time you visit a particular page on our websites, and track the dates and times that you use the Services, the pages you visit, the amount of time spent on specific pages, and other similar usage information, and general data (including the name of the web page from which you entered our website).

- **From Third Parties.** For example, order processing and fulfillment services, credit bureaus, lead generators and aggregators, and other service providers we engage. We also utilize anonymized tracking data from our online banking provider, Q2, to serve advertisements across the Internet. These advertisers use cookies, pixel tags, and other tracking technologies to collect information about your online activity and provide online behavioral advertising.

Finally, we may collect data that is not identifiable to you or otherwise associated with you, such as aggregated data, and is not personal data. To the extent this data is stored or associated with personal data, it will be treated as personal data; otherwise, the data is not subject to this notice.

a. **How We Use Your Personal Data**

We collect and process your personal data for the following purposes:

1. Providing, predicting, or performing, including maintaining or servicing accounts, providing customer service, processing or fulfilling transactions, verifying customer information, and processing payments.
2. Marketing our products and services to you, including sending you messages about the products and services we offer, and which are offered by third parties, which may include contests, rewards, events, and special offers for products and services.
3. Communicating with you by email, mail, text message (SMS, MMS), telephone, push notification, and other methods of communication, about products, services, order status, and information tailored to your requests or inquiries.

4. Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
5. Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
6. Debugging to identify and repair errors that impair existing intended functionality.
7. Short-term, transient use, including, but not limited to, the contextual customization of ads shown as part of the same interaction.
8. Undertaking internal research for technological development and demonstration.
9. Undertaking activities to verify or maintain the quality or safety of the services or devices owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the services or devices owned, manufactured, manufactured for, or controlled by us.
10. Complying with applicable laws, regulations, rules and requests of relevant law enforcement and/or other governmental agencies, or for other purposes, as permitted or required by law.
11. As necessary or appropriate to protect the rights, property, and safety of our users, us, and other third parties.

**b. Who We Share Your Personal Data With**

We share personal data with the following categories of third parties:

- Our service providers.
- Our affiliated entities.
- Our partners or prospective partners in order to provide us and/or our affiliates and partners with information about the use of the Services and levels of engagement with the Services, and to allow us to market products or services on their behalf.
- Government agencies or regulations when permitted or required to do so by law; in response to a request from a law enforcement agency or authority or any regulatory authority; and/or to protect the integrity of the Services or our interests, rights, property, or safety, and/or that of our users and others.

**3. YOUR RIGHTS REGARDING PERSONAL DATA**

You have certain rights regarding the collection and processing of personal data. You may exercise these rights, to the extent they apply to you, by contacting us at the information provided at the end of this Privacy Notice, or by following instructions provided in this Privacy Notice or in communications sent to you.

**a. Accessing, Modifying, Rectifying, and Correcting Collected Personal Data**

We strive to maintain the accuracy of any personal data collected from you, and will try to respond promptly to update our records when you tell us the information in our records is not correct. However, we must rely upon you to ensure that the information you provide to us is complete, accurate, and up-to-date, and to inform us of any changes. Please review all of your information carefully before submitting it to us, and notify us as soon as possible of any updates or corrections. Once you are enrolled in online banking and your account has been open for 120 days, you may submit any changes to your contact information directly through online banking.

Depending on the laws that apply to you, you may obtain from us certain personal data in our records. If you wish to access, review, or make any changes to personal data you have provided to us through the Services, please contact us at the information provided at the end of this Privacy Notice. We reserve the right to deny access as permitted or required by applicable law.

**b. Your California Privacy Rights**

California's "Shine the Light" law, permits our users who are California residents to request and obtain from us a list of what personal data (if any) we disclosed to third parties for their own direct marketing purposes in the previous calendar year and the names and addresses of those third parties. Requests may be made only once per year per person, must be sent to the email address below, and are free of charge.

c. **Your Nevada Privacy Rights**

Nevada law permits our users who are Nevada consumers to request that their personal data not be sold (as defined under applicable Nevada law), even if their personal data is not currently being sold. Requests may be submitted to the contact information at the bottom of this Privacy Notice.

4. **YOUR CHOICES**

You have choices about certain information we collect about you, how we communicate with you, and how we process certain personal data. When you are asked to provide information, you may decline to do so; but if you choose not to provide information that is necessary to provide some of our Services, you may not be able to use those Services. In addition, it is possible to change your browser settings to block the automatic collection of certain information.

- a. **Communications Opt-Out.** You may opt out of receiving marketing or other communications from us at any time through a given communications channel (such as email or telephone) by following the opt-out link or other unsubscribe instructions provided in any email message received, by contacting us as provided at the end of this Privacy Notice, or by informing our customer service representatives of your desire to opt out. If you wish to opt out by sending us an email to the address provided below, please include "Opt-Out" in the email's subject line and include your name and the email address you used to sign up for communications in the body of the email.

Note that if you do business with us in the future, you may not, subject to applicable law, opt out of certain automated notifications, such as order or subscription confirmations, based on business transactions (e.g., e-commerce).

- b. **Location Information.** If you want to limit or prevent our ability to receive location information from you, you can deny or remove the permission for certain Services to access location information or deactivate location services on your device. Please refer to your device manufacturer or operating system instructions for instructions on how to do this.

5. **PROTECTING PERSONAL DATA**

We use reasonable and appropriate physical, technical, and organizational safeguards designed to promote the security of our systems and protect the confidentiality, integrity, availability, and resilience of personal data. Those safeguards include: (i) the pseudonymization and encryption of personal data where we deem appropriate; (ii) taking steps to ensure personal data is backed up and remains available in the event of a security incident; and (iii) periodic testing, assessment, and evaluation of the effectiveness of our safeguards.

However, no method of safeguarding information is completely secure. While we use measures designed to protect personal data, we cannot guarantee that our safeguards will be effective or sufficient. In addition, you should be aware that Internet data transmission is not always secure, and we cannot warrant that information you transmit utilizing the Services is or will be secure.

6. **RETENTION OF PERSONAL DATA.**

We retain personal data as long as we deem necessary to carry out the processing activities described above, including but not limited to compliance with applicable laws, regulations, rules and requests of relevant law

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enforcement and/or other governmental agencies, and to the extent we reasonably deem necessary to protect our and our partners' rights, property, or safety, and the rights, property, and safety of our users and other third parties. Under certain state laws, we may be required to retain certain information for five (5) years.

**7. OTHER IMPORTANT INFORMATION ABOUT PERSONAL DATA AND THE SERVICES.**

- a. **Payment Information.** Payments made in connection with a loan are processed by our third party payment provider, SWBC (Bacon Loan Pay), and are subject to SWBC's [privacy policy](#) and the Bacon Pay [terms of service](#). In addition, for online banking clients, payments are made through our third-party payment provider, Web Billpay, and are subject to Web Billpay's [privacy policy](#) and [terms of service](#). Finally, payments made in connection with United Heritage Charity Foundation are processed by Rayze and Stripe. Accordingly, these payments are governed by Rayze's [privacy policy](#); and Stripe's [privacy policy](#) and [terms of service](#).

When you make a payment through SWBC, our administrative employees may see certain personal data for compliance and fraud protection purposes. Otherwise, when you make a payment through our other payment processors listed above, we do not receive your full credit card number, credit card expiration date, or the security code. We may, in some instances, receive a token from the payment processor that represents your account, your card's expiration date, card type and the last four digits of your card number. In addition, we may have access to your payment information to assist with transactions and service accounts. If we engage other third parties, we will inform you by posting an updated Privacy Notice on the Services.

- b. **Collection of Personal Data from Children.** Children under 18 years of age are not permitted to use the Services without a joint owner who is 18 years or older. By using the Services, you represent that you are 18 years of age or older, or have a joint owner who is 18 years or older on an online bank account.
- c. **Third-Party Websites and Services.** As a convenience, we may reference or provide links to third-party websites and services, including those of unaffiliated third parties, our affiliates, service providers, and third parties with which we do business (including, but not limited to our service providers). When you access these third-party services, you leave our Services, and we are not responsible for, and do not control, the content, security, or privacy practices employed by any third-party websites and services. You access these third-party services at your own risk. This Privacy Notice does not apply to any third-party services; please refer to the Privacy Notices or policies for such third-party services for information about how they collect, use, and process personal data.
- d. **Business Transfer.** We may, in the future, sell or otherwise transfer some or all of our business, operations or assets to a third party, whether by merger, acquisition or otherwise. Personal data we obtain from or about you via the Services may be disclosed to any potential or actual third-party acquirers and may be among those assets transferred.
- e. **Do Not Track.** We use analytics systems and providers that process personal data about your online activities over time and across third-party websites or online services, and these systems and providers may provide some of this information to us. We do not currently process or comply with any web browser's "do not track" signal or similar mechanisms.
- f. **International Use.** Your personal data will be stored and processed in the United States. If you are using the Services from outside the United States, by your use of the Services you acknowledge that we will transfer your data to, and store your personal data in, the United States, which may have different data protection rules than in your country, and personal data may become

accessible as permitted by law in the United States, including to law enforcement and/or national security authorities in the United States.

**8. MODIFICATIONS AND UPDATES TO THIS PRIVACY NOTICE**

This Privacy Notice replaces all previous disclosures we may have provided to you about our information practices with respect to the Services. We reserve the right, at any time, to modify, alter, and/or update this Privacy Notice, and any such modifications, alterations, or updates will be effective upon our posting of the revised Privacy Notice. We will use reasonable efforts to notify you in the event material changes are made to our processing activities and/or this] Privacy Notice, such as by posting an updated Privacy Notice on the Services or sending you an email. Your continued use of the Services following our posting of any revised Privacy Notice will constitute your acknowledgement of the amended Privacy Notice.

**9. APPLICABILITY OF THIS PRIVACY NOTICE**

This Privacy Notice is subject to any agreements that govern your use of the Services. This Privacy Notice applies regardless of the means used to access or provide information through the Services.

This Privacy Notice does not apply to information from or about you collected by any third-party services, applications, or advertisements associated with, or websites linked from, the Services. The collection or receipt of your information by such third parties is subject to their own privacy policies, statements, and practices, and under no circumstances are we responsible or liable for any third party's compliance therewith.

**10. ADDITIONAL INFORMATION AND ASSISTANCE**

If you have any questions or concerns about this Privacy Notice and/or how we process personal data, please contact us at:

P.O. Box 202020  
Austin, TX 78720  
[ask@uhcu.org](mailto:ask@uhcu.org)  
512-435-4545

For more information about how users with disabilities can access this Privacy Notice in an alternative format, please contact us through the above contact methods.