

POLAM WEBSITE PRIVACY POLICY Effective May 23, 2016

POLAM Federal Credit Union (POLAM) respects your right to privacy and understands the importance of maintaining the security of your personal information. This Online Privacy Policy ("Policy") pertains to your use of the POLAM Federal Credit Union Website, www.polam.org, ("Website"), and it explains how we collect, share, use and protect information when you visit or use POLAM FCU Website and any other online services offered by POLAM Federal Credit Union. By using the Website, you consent to the terms and conditions of this Policy, including your consent to our use and disclosure of information about you in the manner described in this Policy. The term "us," "we," "our" and POLAM in this Policy refers to POLAM Federal Credit Union. The term "you" or "your" refers to the viewer of this Policy.

COLLECTING AND USING INFORMATION

You may interact with us in a variety of ways online, including through a mobile device. We may offer sites or applications that permit browsing and do not require registration. We may also offer the ability to access your POLAM accounts online. When you interact with us online, we will not obtain personal information about you unless you choose to provide such information. This may include:

- Your first and last name;
- A tax identification number;
- Your address;
- An e-mail address;
- A telephone number
- Other identifiers that enable physical or electronic contact with you;
- Data resulting from your activity, such as transaction information; and
- Limited location information (such as a zip code to help you find a nearby ATM).

We may also collect information about your visit, such as:

- The IP address from which you access the Website;
- Search engine used;
- Referring Website addresses;
- The type of browser and operating system used to access the Website;
- The date and time you access the Website;
- The parts of our Website you access and the information you request; and
- The Website you visit next.

We may also gather information collected through cookies as described further below:

We use the information described above in a number of ways, for example:

- To send you important information regarding the Website, changes to terms, conditions and/or policies;
- To verify your identity (such as when you access your account information);
- To respond to your requests and to communicate with you;
- To send you marketing communications that we believe may be of interest to you;
- To allow you to participate in surveys, sweepstakes, contests and similar promotions;
- For our business purposes, including data analysis, developing and improving our products and services, and enhancing our Website; and
- To prevent fraud and enhance the security of our Website.

Google Analytics

We use Google Analytics to understand how visitors engage with our website. For information on how Google uses the data it collects, and how to control the information sent to Google, please visit [Google's Privacy & Terms](#).

Cookies

To provide better service and a more effective Website, we use "cookies" as part of our interaction with your browsers. "Cookies" are pieces of information that are stored directly on the device you are using. Cookies cannot be used to find out the identity of any user. Your browser can be set to warn you when a cookie has been sent, allowing you to decide whether to accept or reject it. If you configure your web browser to reject cookies, you limit the functionality we can provide you and you may experience some inconvenience in your use of the Website and some online products and services. As an example, if we are not able to recognize your device, you will need to answer a challenge question or questions each time you log on. You also may not receive customized advertising or other offers from us that may be relevant to your interests and needs. We use cookies on parts of the Website where you need to register, such as online banking, or where you are able to customize the information you see. Recording a cookie at such points may facilitate a quicker and easier browsing experience and enable you to personalize the browsing experience.

"Do Not Track" Signals

"Do Not Track" ("DNT") refers to an HTTP header used by Internet web browsers to request a web application disable its tracking or cross-site user tracking. When DNT is enabled, a user's web browser adds a header to content requests indicating that the user does not want to be tracked. California law requires us to disclose how we respond to web browser DNT signals. It is the responsibility of the user to manage the DNT settings for each device and browser you use, and each browser refers to these settings in terminology unique to that browser. We engage in online behavioral tracking for internal research and development purposes. We do not, however, engage in online behavior tracking for marketing purposes. Our Website product and service promotions are visible to everyone who visits our Website. There is no mechanism at this time to opt-out of these online promotions. If we receive a DNT signal, we do not respond to or honor the request and therefore, do not disable tracking. Our Website does not accept web browser DNT signals or similar mechanisms that may provide you with the ability to exercise choice regarding the collection of personally identifiable information about your online activities over time and across third-party Websites we may use.

Sharing of Information

If you are a POLAM Federal Credit Union member, we may use and share any information that we collect from or about you in accordance our [Privacy Policy](#). We may share the information we collect from you and about you with third parties only as permitted by law in connection with the administration, processing or servicing of accounts. For example, this may include: sharing information with credit bureaus, in response to a subpoena or other legal process, sharing to address fraud, security or technical issues, or as part of an audit or examination. We do not share or make available any personal information about your online activities as it pertains to your use of this Website or any third-party Websites.

Links to Third-Party Websites

The Website may contain links to third-party Websites. Although these links were established to provide you with access to useful information, POLAM does not control and is not responsible for any of these Websites or their contents. We do not know or control what information third-party Websites may collect regarding your personal information. POLAM is providing these links to you only as a convenience, and does not endorse or make any representations about using such third party Websites or any information, software or other products or materials found there, or any results that may be obtained from using them. We encourage you to review the privacy policies of Websites you choose to link to from the POLAM Website so that you can understand how those Websites collect, use, and share your information. POLAM FCU is not responsible for the security or privacy practices of the linked Websites.

Protecting Your Online Financial Privacy

POLAM is committed to protecting the privacy of your personal and financial information. Access to our systems containing nonpublic personal information is only provided to those employees and agents whom we determine need it for the purpose of providing products or services to you. To safeguard your nonpublic personal information, we maintain physical, electronic, and procedural safeguards that comply with federal regulations. We regularly test and update our technology to ensure we maintain commercially acceptable standards in securing your financial privacy. However, no data transmission over the Internet can be

guaranteed to be one hundred percent secure. As a result, we cannot and do not guarantee or warrant the security of any information you transmit on or through the Website, and you do so at your own risk.

Review or Request Changes to Your Information

If you are a registered Online Banking user, you may review and update your personal information by logging in your online banking account and selecting the Personal Information link under the tools menu on the right side of the screen. You can also update your information by calling us at (800) 404-5137 or by sending us a Secure Message after logging into your online banking account, or by writing to us at:

POLAM FCU
589 N. Larchmont Blvd.
Los Angeles, CA 90027

Children's Online Information Privacy

The [Children's Online Privacy Protection Act of 1998](#) ("COPPA") restricts the collection, use, or disclosure of Personal Information from and about children under the age of 13 on the Internet. POLAM is committed to protecting the online privacy of the children who visit our site and complying with COPPA. The Website is not directed to children under the age of 13 and we request that children under the age of 13 not provide personal information through the Website. We do not knowingly collect, maintain, or use personally identifiable information from the Website about children under the age of 13 without parental consent. Visit the [Federal Trade Commission](#) Website for more information about COPPA.

Updates to this Policy

This Policy is subject to change at any time. Please review it periodically. Any changes to this Policy will become effective when we post the revised Policy on the Website. Your use of the Website following these changes means that you accept the revised Policy.

Contact Us:

If you have any questions regarding this Policy call us at **(800) 404-5137** or write to us at:

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