



## Clearview Federal Credit Union Online and Mobile Privacy Policy

This policy is effective 09/01/2015 and may be amended from time to time.

### Clearview's Commitment to Members

Clearview is committed to respecting and protecting the privacy of our members and site visitors. We protect your information online with the same care we utilize for all Clearview transactions. This Online and Mobile Privacy Policy explains what information we collect about you and how we use and protect it in mobile and internet commerce. Our online and mobile privacy practices outlined below strictly abide by the terms of our privacy notice, [found here](#).

### Personal Information and Data

#### Personal Information

Personal information refers to any information about you that is personally identifiable to you. Your telephone number, name, address, and transaction history are examples of information that pertain to you personally.

#### Data

Data in the context of this Online and Mobile Privacy Policy generally refers to other information that we collect through your internet or mobile activities or which third parties may collect on our behalf. Such data may or may not be personally identifiable to you. Geolocation data collected from your mobile device when you ask for the location of the nearest ATM is personally identifiable when obtained through Mobile Banking.

### Information Collection

#### We Collect Personal Information About You When:

- **You Provide Personal Information to Us --**

Clearview collects personal information online that you provide to us, such as when you log in, on applications you complete, and when you use our products and services. See [What Does Clearview Do With Your Personal Information](#) for more information about what personal information is collected, how, and why.

- **We Obtain Personal Information from Others --**

We obtain personal information from third parties such as credit bureaus and others to tailor your online experience.

- **We Gather Information Online --**

Our website uses cookies, tracking pixels and related technologies. Cookies are small data files that are served by our platform and stored on your device. Our site uses cookies dropped by us or third parties for a variety of purposes, including to operate and personalize the website. Cookies may also be used to track how you use the site to target ads to you on other websites.

#### Cookies

Clearview does not store confidential or sensitive personal information in cookies. Clearview uses cookies to enhance our members' Online Banking session by making navigation easier and providing important security features. For certain applications, such as Online Banking, cookies are a requirement because they help protect the privacy of a member's transactions by, for example, automatically terminating the online session if the member forgets to log out.

Cookies cannot be used to capture your email address, obtain data from your hard drive or gain confidential or sensitive information about you. Additionally, cookies cannot be read by a website other than the one that set the cookie. Some websites, however, use cookies to obtain information from your browser. You can set your browser to notify you before accepting a cookie, so that you can control whether you accept or reject a cookie. You will need to manage your cookie settings for each device and browser you use. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.

### **Click Stream auditing**

Click Stream Auditing includes information such as a web surfer's IP address, web pages which have been viewed or acted upon by a web surfer, date and time, domain type, and when a web surfer has responded to an advertisement. We may occasionally combine this information with individual information on an aggregate level to determine the effectiveness of our advertising.

### **Action Tags and Other Technologies**

Action Tags are commonly referred to as web beacons or GIF tags. This type of technology is inserted in various places within our website to collect anonymous information about your visits to the Clearview site and your interaction with our ads and content. Clearview may use certain technologies to collect additional information related to the status and condition of your mobile devices. This information may be used to support the security of your transaction with Clearview, determine industry trends and for other research purposes.

### **Information Use**

Personal information that we collect about you is used to provide you with optimal online experiences with us. We use it to help determine your financial interests and needs in order to recommend relevant products and services. We use personal information about you to qualify you for products and services that you request, to process your transactions, authenticate your identity, prevent fraud, and to keep your information and financial transactions secure.

### **Information Sharing**

Clearview shares your personal information within its affiliates and with select third parties in accordance with the terms described in our privacy notice, [What Does Clearview Do With Your Personal Information](#). The notice also provides a toll free number for you to limit certain sharing. Additional information is provided below under **Advertising and Tracking** and under **Your Options**. We may share personal information when required by law or a subpoena or court order. We may also share personal information when we suspect fraud or for risk management purposes.

### **Children**

Clearview websites and mobile applications are not directed to children and do not knowingly collect information from children.

### **Access**

Clearview does not maintain a process which allows visitors to review and request changes to any of his or her personally identifiable information, including information that is collected through the use of cookies or other tracking devices, on the website or our online service. If you believe that Clearview member records contain any incorrect information about you, please contact us at 1-800-926-0003 or visit any Clearview branch.

### **Retention and Destruction**

Clearview retains personally identifiable information as long as necessary to provide the products and services for which the information was collected, to process and maintain a record of transactions, and as long as necessary for legal process or to satisfy government retention requirements. When the retention period expires, Clearview destroys data that was maintained in any form in a manner that renders it completely unusable and incapable of restoration.

## **Advertising and Tracking**

### **Tracking and Online Advertising**

Rev. 12/11/2018

We use third party advertising and media companies to serve ads on our behalf across the internet and to help manage and optimize our business and communications. Through the use of cookies and Action Tags (commonly referred to as web beacons or GIF tags), which are inserted in various places within our website, such third party companies may collect anonymous information about your visits to the Clearview site and your interaction with our ads and content. For instance, they may keep track of how many of our ads you have seen on other websites before visiting our website. This information is used to understand your browsing behavior and interests so that we can identify your financial needs and provide service and advertising that is tailored to you.

### **Behavioral Targeting**

The third party companies we use for online tracking have a network of advertising companies and may share anonymous information about your visits to clearviewfcu.org and other websites with us. They may also use said anonymous information in order to provide ads about goods and services of interest to you and which would be relevant to you, based on your browsing on clearviewfcu.org. From time to time, we may also share anonymous information with such third party companies in an aggregate form, for purposes of analysis and improvement of our website. If you would like more information about the use of third-party cookies and tags, or the process of opting out of such cookies or tags, please go to [networkadvertising.org](http://networkadvertising.org).

### **Geolocation Data**

Clearview does not access location data stored on your mobile device without your permission. Some features, such as our Location tool, which locates the nearest Clearview branch or ATM and shows the best route to get there, will not fully function unless you have enabled access to your location data.

### **Links to Other Sites**

#### **Links to Other Sites**

Links to other websites are provided for your convenience and information only. When you click on a link to another website you will be leaving ours. The links on our website do not mean that we endorse, authorize or sponsor the linked website. The linked sites are not under our control and we are not responsible for the content on a linked website. Linked sites may have privacy policies that are different from ours.

### **Social Media**

#### **Social Media**

Clearview maintains information on social media sites like Facebook, Twitter, and YouTube. When you post information on Clearview social media pages, it will be subject to the privacy and security conditions of the social media site. When you log into Clearview-owned social media properties, we collect information about your activities on those properties. The information we review includes whether you visited or commented on a blog or provided a rating.

Clearview mobile applications are not socially enabled and do not allow you to connect to and share information with a community of other users, such as Facebook or Twitter, or the general public, such as YouTube.

### **SMS Texting Programs**

#### **SMS Texting Programs**

Clearview collects personal information when you enter our texting programs. We may use such information to fulfill prizes, track compliance with our rules and terms and conditions, or for editorial and feedback purposes (to the extent that is explained when you provide the information). Information submitted at the time of texting may also be used for our marketing and promotional purposes. If you object to any such use, you may stop that use by replying "STOP" to the text message they received. If you opt out and subsequently opt in again, you agree to again be added to our database. Standard text and data rates will be charged for each text message sent or received from your handset according to the terms of the carrier. Check with your wireless carrier for your handset capabilities and pricing plan details. While opted in to Clearview Federal Credit Union's text messaging programs, you can reply HELP for help and STOP to cancel.

## Your Options

### Online Tracking and Advertising

Clearview uses third-party advertising networks to distribute our advertisements on other websites and mobile applications where we have paid to advertise. These advertisements may use tracking technologies to capture certain information, such as IP address, usage information, or your responsiveness to our advertisements. However, the technologies used do not capture information that identifies you individually. Clearview does participate in third party ad network self-regulatory programs for online behavioral advertising.

Pursuant to these programs, Clearview honors Do Not Track opt-out preferences that you make to third party advertising networks that we hire to perform online advertising on our behalf. Two examples are the [Digital Advertising Alliance's \(DAA\) Self-Regulatory Program for Online Behavioral Advertising](#) and [DoubleClick](#). Click on either or both of these links to stop online advertising from Clearview by either of these ad programs. You can also help limit the amount of online advertising you receive by visiting [www.networkadvertising.org](http://www.networkadvertising.org) to opt-out of advertising from Network Advertising Initiative member companies.

We do not deliver online advertising to members that have opted out from the receipt of commercial email from Clearview when an online advertising campaign utilizes member email addresses in connection with a hashing process that anonymously matches our ads to our members who have a presence on select websites.

Clearview does not provide a Do Not Track opt-out mechanism to prevent online advertising to you. Instead, we utilize the established industry mechanisms discussed above.

Clearview does not respond to a do-not-track signal from your browser. See [www.networkadvertising.org](http://www.networkadvertising.org) for information on how to opt out from third party cookies or tags. As noted above, when you use Clearview's websites, third parties used by Clearview may collect certain information which does not identify you individually on the Clearview websites or on other sites where Clearview advertises. Please review the Privacy Policies of all websites you visit to ascertain the type of information collected on those sites. The type of personal information that Clearview collects online about you is identified above under heading **Personal Information and Data**, subsection: *We Collect Personal Information About You When*.

### Location Tracking

Online advertising that relies on location tracking can be prevented by refusing to grant permission to use location data stored on your device. You can also set your device to block access to location data stored on your device. Refer to the user guide for your device.

### Controlling Cookies

Visit the [Federal Trade Commission](#) to learn more about how to limit tracking and online advertising through controlling cookies and other tracking technology that is attached to your browser.

### Joint Marketing

Joint marketing enables financial institutions to legitimately share customer information with another financial institution under a marketing arrangement to sell financial products and services. This practice is described in Clearview's privacy notice, [What Does Clearview Do With Your Personal Information](#). Members may call 1-800-926-0003 to opt out of joint marketing.

### Affiliate Sharing and Marketing

Clearview shares information about you among its affiliates in order to provide you with our full range of financial products and services. Please refer to Clearview's privacy notice, [What Does Clearview Do With Your Personal Information](#), for a full explanation of these practices and an explanation regarding why all such sharing is not limited. Members may call 1-800-926-0003 to opt out of affiliate sharing and marketing.

**Policy Changes**

The effective date of this policy is provided above. Any updates or changes to the policy will be posted on this website with the new revision date, which is the effective date of changes. Your continued use of this website constitutes your acceptance of any changes to this policy.

**Contact**

You may contact us at 1-800-926-0003.