

## **OMNI Community Credit Union Online Privacy Policy**

Effective Date: April 30, 2025

OMNI Community Credit Union (“we”, “our,” and “us”, and “Credit Union”) values the privacy of our members and visitors to our Sites. We take our responsibility seriously to protect any information we may collect as you interact with us online.

### **Our Online Privacy Policy**

This Online Privacy Policy (“Policy”) covers your interaction with us and partners engaged by us to provide online services to you when you visit any mobile or online site or application that we own and operate, including, but not limited to, our website and our online and mobile banking applications (collectively, “Sites”).

This Policy describes and discloses:

- the types of personally identifiable information (“Personal Information”) that we may collect about you when you interact with or visit our Sites; describes categories of other persons or entities with whom we may share your Personal Information;
- the way you can review and request changes to any of your Personal Information that we collect;
- whether other parties may collect Personal Information about your online activities over time and across different websites when you use our Sites;
- if we engage in the collection of your Personal Information about your online activities over time and across different websites;
- how we respond to web browser “do not track” signals or other opt-out mechanisms;
- how we protect children’s privacy; and
- how we will inform you of important changes to our Policy;

This Policy does **not** cover your interaction with websites or mobile applications that we do not own and operate, including, but not limited to, those of third parties and partner companies linked to from our Sites. Websites and mobile applications that we do not own and operate are governed under their own privacy policies. We encourage you to carefully review those other privacy policies before engaging with those websites and applications.

### **What Information Do We Collect?**

We collect Personal Information only as allowed by law. Use of the internet makes it possible for other parties to collect data about your online activities over time and across different websites, including when you use our Sites. We may collect Personal Information when you enter data into forms, surveys, or applications for new products or services, or when you use our products and services. Personal Information may include your name, member number, address, social security

or other government-issued ID number, telephone number, and email address. Additionally, our Sites may collect other information from visitors to our Sites, such as your geolocation, IP address, or device identifier for statistical purposes.

## **How Do We Use Personal Information?**

We may use Personal Information:

- To respond to your inquiries and fulfill your requests;
- To inform you about important information regarding our Sites, products or services for which you apply or may be interested in applying for, or in which you are already enrolled, changes to terms, conditions, and policies and/or other administrative information;
- To deliver marketing communications that we believe may be of interest to you, including, ads or offers tailored to you;
- To personalize your experience on our Sites;
- To allow you to apply for products or services (e.g., to apply for membership, prequalify for a mortgage, apply for a credit card, or to open a deposit account or other financial product) and evaluate your eligibility for such products or services;
- To verify your identity and/or location (or the identity or location of your representative or agent) in order to allow access to your accounts, conduct online transactions and to maintain measures aimed at preventing fraud and protecting the security of account and Personal Information;
- To allow you to participate in satisfaction surveys and other forms of market research, sweepstakes, contests and similar promotions, and to administer these activities. Some of these activities have additional rules, which may contain additional information about how Personal Information is used and shared;
- To allow you to use our financial planning tools. Note that information that you enter into one of these planning tools may be stored for future access and use. You have the option to delete the information;
- Collected through our social media pages and other online interactions with you to assist in verifying your identity and account status. We may combine this online information with information collected from offline sources or information we already have;
- For business purposes, including data analysis, audits, developing and improving products and services, enhancing our Sites, identifying usage trends and determining the effectiveness of promotional campaigns;
- For risk control, for fraud detection and prevention, to comply with laws and regulations, and to comply with other legal process and law enforcement requirements;
- To allow you to utilize features within our Sites by granting us access to information from your device such as geolocation when you request certain services.

## **How Do We Collect and Use Other Information?**

“Other Information” is any information other than Personal Information that does not reveal your specific identity or does not directly relate to an individual. Examples of Other Information include browser information, information collected through cookies, pixel tags and other technologies, demographic information, and aggregated and de-identified data. We and our third-party service providers may collect and use Other Information in a variety of ways, including:

1. Your browser or device. Some information is collected by most browsers and/or through your device, such as your device type, screen resolution, operating system version, and

internet browser type and version. We use this information to ensure our Sites function properly, for fraud detection and prevention, and security purposes.

2. **Cookies.** Cookies are pieces of information stored directly on your device. The cookies we use do not contain or capture unencrypted Personal Information. Rather, the cookies we use allow us to collect information such as browser type, time spent on our Sites, pages visited, Site preferences, and your relationship with us. We use the information for security purposes, to display information more effectively, to personalize your experience with our Sites, and to recognize your device to allow your use of our products and services. We also collect statistical information about the usage of our Sites in order to continually improve the design and functionality, to monitor responses to our advertisements and content, to understand how members and visitors use our Sites, and to assist us with resolving questions regarding our Sites. We also use cookies for advertising purposes, as described in the Advertising section of this Policy. You can refuse to accept these cookies, and most devices and browsers offer their own privacy settings for cookies. You will need to manage your cookie settings for each device and browser you use. However, if you do not accept these cookies, you may experience some inconvenience in your use of our Sites. For example, we will not be able to recognize your device and you may need to answer a security question each time you log on. You also may not receive tailored advertising or other offers from us that may be relevant to your interests and needs. You may also be unable to use certain services and features
3. **Other Technologies.** Other technologies include pixel tags, web beacons and clear GIFs used in connection with some Site pages, mobile app features, and HTML-formatted email messages to measure the effectiveness of our communications, the success of our marketing campaigns, to compile statistics about usage and response rates, to personalize your experience with us, for fraud detection and prevention, for security purposes, and for advertising as set forth in the Advertising section below.
4. **Your IP Address:** Your IP Address is a number that is automatically assigned to the device that you are using by your Internet Service Provider (ISP). An IP Address is identified and logged automatically in our server log files whenever you visit our Sites, along with the time of the visit and the page(s) visited. Collecting IP Addresses is standard practice and is done automatically by many websites. We use IP Addresses for purposes such as calculating Site usage levels, helping diagnose server problems, to personalize your experience while engaging with us online and offline, for compliance and security purposes, for administering our Sites, and for advertising as set forth in the Advertising section below.
5. **Location Based Information:** Our digital banking collects location data to enable push notifications and promotional offers even when the application is closed or not in use. If you use any location-based feature of mobile banking, you agree that your geographic location and other Personal Information may be accessed and disclosed through mobile banking. If you wish to revoke access to such information, you must cease using location-based features of mobile banking via your device's settings.
6. **Google Analytics:** Many websites and applications use Google services to improve their content. When they integrate Google services, these sites and applications share information with Google. We use Google Analytics to better understand how users are visiting and using our Sites. Google Analytics collects information such as how often users visit the Sites, what pages they visit when they do so, and what other sites they used prior

to coming to our Sites. Google Analytics collects the IP address assigned to you on the date you visit our Sites, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Although Google Analytics plants a cookie on your web browser to identify you as a unique user the next time you visit our Sites, the cookie cannot be used by anyone but Google. For additional information about how Google Analytics collects and processes data and how to control the information sent to Google, please refer to 'How Google uses information from sites or apps that use our services' at <https://policies.google.com/technologies/partner-sites>.

7. Personal information: When you interact with us through our Sites, we will not obtain Personal Information about you unless you choose to provide such information. Personal Information that we may collect about you through online interaction includes information that you provide, such as your name, mailing address, email address, phone number and other contact information; data resulting from your activity, such as transaction information; and limited location information (for example, a zip code to help you find a nearby ATM). We may also collect payment card information, social security numbers and driver's license numbers when you provide such information while using the online applications on our Sites.

### **Our "Do Not Track" Policy as Required by California Online Privacy Protection Act (CalOPPA)**

Our Sites do not respond to Do Not Track signals. However, some third-party websites do keep track of your browsing activities. If you are visiting such websites, you can set your preferences in your web browser to inform websites that you do not want to be tracked. You can enable or disable Do Not Track by visiting the preferences or settings page of your web browser.

### **Our Mobile Application**

Certain features of our mobile banking application may collect the names of your contacts and their phone numbers, email addresses, postal addresses, and other contact information. You either enter this information into the application or agree to its collection/accessing automatically by using the application. We may share the information collected/accessed with third parties. If you do not consent to our access, collection, sharing or transmission of the data as indicated below, please do not use our mobile application.

### **With Whom Do We Share the Information We Collect?**

We may share your Personal Information with affiliates and third parties in accordance with the practices set forth in our Privacy Notice available on the OMNI Community Credit Union website.

We do not and will not sell your Personal Information. We may use or share information to enhance your experience on our Sites, to help deliver our ads on your web browser, and to measure advertising campaign effectiveness. We may also share your information as required to meet legal and regulatory obligations.

### **Disclosure of Personal Information**

We may disclose Personal Information, as permitted by law, and: (1) consistent with our Privacy Notice; (2) to comply with applicable laws; (3) to respond to governmental inquiries or requests; (4) to comply with valid legal process; (5) to protect our rights, privacy, safety or property; (6) to permit us to pursue available remedies or limit damages that we may sustain; and (7) to enforce our rights resulting from inappropriate use of our Sites.

In the event there is a change in our corporate structure such as, but not limited to, merger, consolidation, sale, liquidation, or transfer of substantial assets, we may, in our sole discretion, transfer, sell or assign information collected on and through our Sites, including without limitation, Personal Information concerning visitors, to one or more affiliated or unaffiliated third parties

### **Our Social Media Presence**

We provide experiences on social media platforms including, but not limited to, Facebook®, Instagram®, Twitter®, YouTube®, and LinkedIn® that enable online sharing and collaboration among users who have registered to use them. Any content you post on official OMNI Community Credit Union managed social media pages, such as pictures, information, opinions, or any Personal Information that you make available to other participants on these social platforms, is subject to the terms of use and privacy policies of those respective platforms. Please refer to them to better understand your rights and obligations with regard to such content.

### **Maintaining Accuracy in Online and Mobile Information**

We strive to maintain complete and accurate online and mobile information about you and your accounts. If you believe that our records contain inaccurate or incomplete information about you, call 866-666-4969. Our online and mobile banking members may access and edit their own information by logging in to our secure online banking service and navigating to “Settings”. We will correct any confirmed inaccuracies as necessary and appropriate.

### **How You Can Control Your Information**

Our Sites are designed for optimal viewing with cookies enabled. For example, cookies store your preferences for when you visit our Sites. If your web browser settings allow cookies, our Sites will utilize them. You may disable or remove cookies by accessing your web browser settings. Our Sites will still function without cookies, but some features may not work properly. We do not monitor your online activities after you leave our Sites. We only use your Personal Information for certain purposes allowed by law, as set forth in this Policy and our Privacy Policy, which you cannot limit. You may, however, be able to opt out of certain advertisements. To learn more about a particular advertising network (including how to opt out), click on the industry group network symbol or link located on the advertisement.

### **Our Do Not Track Policy**

Due to a lack of consistent standards across browsers, our Sites may not respond to “do not track” browser settings. As set forth above, we do not monitor your online activities after you leave our Sites. However, some third-party websites do keep track of Your browsing activities. If You are visiting such websites, You can set Your preferences in Your web browser to inform websites that You do not want to be tracked. You can enable or disable Do Not Track by visiting the preferences or settings page of Your web browser.

## **Our Web Linking Practices**

We may provide access to information, products or services offered on websites that are owned or operated by other companies. We provide this access through the use of hyperlinks that automatically move you from our Sites to the third-party website.

While we do our best to provide you with helpful, trustworthy resources, we cannot endorse, approve or guarantee information, products, services or recommendations provided at any third-party website. Because we may not always know when information on a linked site changes, we are not responsible for the content or accuracy of any third-party website. We are not responsible for any loss or damage of any sort resulting from the use of a link on our Sites nor will it be liable for any failure of products or services advertised or provided on any third-party website.

We offer links to you on an "as is" basis. When you visit a third-party website by using a link on our Sites, you will no longer be protected by our privacy policy or security practices. The data collection, use, and protection practices of the third-party website may differ from the practices of our Sites. You should familiarize yourself with the privacy policy and security practices of the third-party websites that you visit, and not our policies and practices (unless otherwise disclosed to you).

Products, services, and benefits offered by third parties at third-party websites are obligations of those third parties, are not an obligation of, a deposit of, or guaranteed by OMNI Community Credit Union or any of its affiliates, and are not NCUA insured.

## **Use of Online Surveys and Sweepstakes**

Online surveys and sweepstakes are offered from time to time on our Sites. Online surveys are used so that we can gather information to better serve you. Based on the information you provide to us, we may inform you of Credit Union accounts and services available to you. You are not required to complete online surveys, sweepstakes or promotions. You should carefully review the rules of each sweepstakes or promotion in which you participate through our Sites, as they may contain additional important information about our use of your Personal Information. To the extent that the terms and conditions of each sweepstakes or promotion concerning treatment of your Personal Information conflict with this Policy, the terms and conditions of the sweepstakes or promotion will control.

## **Children's Privacy**

We do not knowingly collect Personal Information from individuals under the age of 13 who use our Sites without obtaining consent from a parent or legal guardian. To learn more about the Children's Online Privacy Protection Act (COPPA), please visit the Federal Trade Commission's website.

## **Your Data Sharing**

Although OMNI Community does not share your Personal Information with nonaffiliated third-party companies except as provided by our Privacy Notice, we are aware that you may choose to do so in order to use their services. For example, you may have authorized some third-party companies to access your Personal Information and account data to offer financial information and services such as account aggregation, making payments via a website or mobile application, and tax preparation. Because these third-party companies have access to your Personal

Information and account data and may use your account sign in credentials in order to provide the service, we recommend you use caution when granting such access to third-party companies.

Some of these third-party companies may use other companies to assist them with providing services or with accessing your Personal Information or account data. Any one or all of these companies may be storing your Personal Information or account data. We are not responsible for the use or disclosure of any Personal Information or account data accessed by or on behalf of any company or person to whom you provide your OMNI Community Credit Union sign in credentials or account information. We do not control the privacy, security, or accuracy of your information that may be held by these third-party companies, which are governed by the third-party's privacy policy and data security program. We are also not responsible for any fees associated with these third-party services.

Except as may otherwise be required by law, when you provide your sign in credentials to your OMNI Community Credit Union accounts to a third party, you will be deemed by us to have authorized all transactions or actions initiated by that third party using the access information you provided, whether or not you are aware of the specific transaction or action. If you decide to revoke the access authority you previously gave to a third party, we strongly recommend that you change your OMNI Community Credit Union username and password to ensure that the party cannot continue to access your account(s). For security and other reasons, we specifically reserve the right to block or disable third-party access to any account without notice. Additional information on our digital banking terms and conditions can be found in our Digital Banking Agreement and Disclosure.

### **Safeguarding Personal Information**

We employ appropriate safeguards to protect Personal Information that you provide to us through our Sites. Unfortunately, no method of transmitting or storing data can be guaranteed to be 100% secure. As a result, although we strive to protect Personal Information, we cannot ensure the security of any information you transmit to us through or in connection with our Sites. If you have reason to believe that your interaction with us is no longer secure, please notify us of the problem by contacting us at 866-666-4969.

In the unlikely event that we believe that the security of your Personal Information in our possession or control may have been compromised, we may seek to notify you of that development. If a notification is appropriate, we would endeavor to do so as promptly as possible under the circumstances, and, to the extent we have your email address, we may notify you by email.

We may include links in our emails that link you to information on our Sites about our products, services, and special pricing or promotional offers. However, we will never ask you for Personal Information in an email from us (for example, username, password, Social Security number or account number). We will also never include links that take you to a non-secure page where you are asked to provide this information. To determine whether an email that you have received from us is legitimate, you may contact us at 866-666-4969 or through Digital Banking messaging.

If you receive a telephone call, text, email or other correspondence requesting that you provide any sensitive information to a Site that does not seem to be affiliated with us, or that otherwise seems suspicious to you, please do not provide such information and report such request to us at 866-666-4969.

## **Retention of Your Personal Data**

We will retain your Personal Information only for as long as is necessary for the purposes set out in this Policy. We will retain and use your Personal Information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We will also retain Other Information for internal analysis purposes. Other Information is generally retained for a shorter period of time, except when used to strengthen the security or to improve the functionality of our Sites, or we are legally obligated to retain this data for longer time periods.

## **Transfer of Your Personal Data**

Your information, including Personal Information, is processed at our branches and in any other places where the parties involved in the processing are located. It means that this information may be transferred to, and maintained on, computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Policy followed by Your submission of such information represents your agreement to that transfer.

We will take all steps reasonably necessary to ensure that your Personal Information is treated securely and in accordance with this Policy and no transfer of your Personal Information will take place to an organization or a country unless there are adequate controls in place including the security of your Personal Information.

## **Special Notice to Users Located in the European Union**

Our website and services are targeted for users in the United States of America. Any information we collect may be transferred outside of the European Union ("EU") to the United States of America which does not offer an equivalent level of protection as that afforded in the EU in the European Union. Article 26 of the European Union's Data Protection Directive (Directive 95/46/EC, 1995 O.J. (L 281) 31) allows for transfer of personal data from the European Union to a third country if the individual has unambiguously given his consent to the transfer of personal information, regardless of the third country's level of protection. By using our Sites or our services, you consent to the transfer of all such information to the United States which may not offer an equivalent level of protection to that required in the EU and to the processing of that information by us on our servers located in the United States as described in this Policy.

## **Interruption of Service**

At certain times, our Sites or our other electronic services may not be available due to system maintenance or circumstances beyond our control.

## **Internet Access Fees and Telephone Charges**

You agree to be solely responsible for any telephone or data charges, internet access fees, and other similar fees and expenses you may incur by accessing our Sites, our mobile banking application, our online banking services and/or other electronic services, including, but not limited



to, text messages and alerts. Please note that these may be assessed and billed separately by your online service provider, telephone company or cellular service provider.

### **SMS Communications**

By providing us with a telephone number (including a wireless/cellular, mobile telephone number and/or email address), you consent to receiving calls and/or SMS text messages from us and our Service Providers at that number including those made by use of an automatic telephone dialing system ("ATDS"), and/or emails from us for Account servicing and collection purposes, including identify verification.

### **SMS opt-in and telephone numbers collected for SMS communication purposes will not be shared with any third party and affiliates for marketing purposes.**

If you have consented to receiving text messages from us, you may receive messages related to the following:

- Member Support
- Account Support
- Appointment scheduling

Message frequency may vary depending on the type of communication. For example, you may receive up to 5 messages per week related to your account with us.

Please note that standard message and data rates may apply, depending on your carrier's pricing plan. These fees may vary if the message is sent domestically or internationally.

You may opt in to receive messages from the Credit Union in the following ways:

- By submitting an online form

You can opt out of receiving SMS messages at any time. To do so, simply reply "STOP" to any SMS message you receive. Alternatively, you can contact us directly to request removal from our messaging list by calling us at 866-666-4969; writing to us at OMNI Community Credit Union, P.O. Box 1537, Battle Creek, MI 49016, Attention: Marketing; or by visiting any OMNI branch office. Please note that opting-out of SMS messages may result in your access to Digital Banking, including your debit card, being terminated.

If you are experiencing any issues, you can reply with the keyword "HELP" or you can get help directly from us by calling us at 866-666-4969; writing to us at OMNI Community Credit Union, P.O. Box 1537, Battle Creek, MI 49016, Attention: Marketing; or by visiting any OMNI branch office.

## **Policy Updates**

We reserve the right to amend this Policy at any time to address future developments or changes in industry or legal trends. We will post the revised Policy on our Sites or announce the change on our homepage. If we make changes to this Policy, we will revise the "Effective Date" section above. Any changes to this Policy will become effective upon the posting of the revised Policy on our Sites. By continuing to use our Sites following such changes, you will be deemed to have agreed to such changes. If you do not agree with the terms of this Policy, as it may be amended from time to time, in whole or in part, please do not continue using our Sites.

## **How Can You Contact Us Regarding Our Privacy Practices and Related Issues**

If you have questions or require additional information regarding our privacy practices, please contact us by visiting our website. Additional privacy practices can be found on our website at <https://www.omnicommunitycu.org/privacyPolicy.php>.