

# Mobile Privacy Policy

Last Updated: August 2024

**Riegel Federal Credit Union Mobile App (the “App”)** helps you manage your money, view your transactions and accounts, making it easy to manage your finances on the go. Riegel Federal Credit Union is otherwise referred to as “**Your Financial Institution,**” “**Us,**” or “**We**” in this document.

**The App** provides the **Services** to users on behalf of **Your Financial Institution** as a service provider. This Mobile Privacy Policy, in combination with relevant privacy policies that **Your Financial Institution** provides to you (e.g., pursuant to financial privacy laws), informs you of the policies and practices regarding the collection, use and disclosure of any personal information that **the App** collects from or about users in connection with our mobile application (the “**Services**”). The specific capabilities of the **Services** available to you vary depending on **Your Financial Institution**. You can find more information about Riegel Federal Credit Union’s privacy policies (Member Privacy, Internet Privacy, Mobile Privacy) and your choices at [www.riegelfcu.org/home/home](http://www.riegelfcu.org/home/home) or by contacting Riegel Federal Credit Union.

Depending on the **Services** offered by **Your Financial Institution**, **the App** may allow you to:

- get real-time balances for your accounts
- manage your money
- view your transactions and statements
- make transfers
- pay your bills and manage billers
- pay other people
- deposit a check
- manage cards
- locate branches and ATMs
- receive alerts

## THE TYPES OF INFORMATION RIEGEL FEDERAL CREDIT UNION MOBILE APP COLLECTS

**The App** may collect personal information from you in the following ways:

(a) Personal Information You or **Your Financial Institution** Provide to **Us**.

- **Riegel Federal Credit Union** may collect personal information from you or your financial institution, such as your first and last name, address, e-mail, User IDs, telephone number, and social security number when you open a new financial account or register for other financial services. Device images/videos may be accessed when you deposit a check or use a QR code to make peer to peer payments using Zelle® or other payments functionality. Device contacts may be accessed when you make peer to peer payments using Zelle® or other payments functionality. Device location may be accessed to detect and prevent card transaction fraud and also to provide branch and atm locations.
- **The App** may collect the financial and transaction information necessary to provide you with the **Services**, including account numbers, payment card expiration date, payment card identification, verification numbers, and transaction and payment history.

- If you provide feedback or contact **Us** via email, **We** will collect your name and email address, as well as any other content included in the email, in order to send you a reply.
- **We** also collect other types of personal information that you provide voluntarily, such as any information requested by **Us** if you contact **Us** via email regarding support for the **Services**.

(b) Personal Information Collected from Third Parties. **We** may collect certain information from identity verification services and consumer reporting agencies, including credit bureaus, in order to provide some of our **Services**.

(c) Personal Information Collected Via Technology. We and our service providers may automatically log information about you, your computer or mobile device, and your interaction over time with our **Services**, our communications, and other online services, such as:

- Device data, such as your computer's or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers, language settings, mobile device carrier, radio/network information (e.g., WiFi, LTE, 3G), and general location information such as city, state or geographic area.
- Online activity data, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Service, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access.
- Cookies, which are text files that websites store on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, and helping **Us** understand user activity and patterns.
- Local storage technologies, like HTML5 that provide cookie-equivalent functionality but can store larger amounts of data, including on your device outside of your browser in connection with specific applications.
- Web beacons, also known as pixel tags or clear GIFs, which are used to demonstrate that an email was accessed or opened, or that certain content was viewed or clicked.
- Location Information. If you have enabled location services on your phone and agree to the collection of your location when prompted by the **Services**, **We** will collect your location information when you use the **Services**; for example, to provide our fraud detection services. If you do not want **the App** to collect this information, you may decline the collection of your location when prompted or adjust the location services settings on your device.

## HOW THE APP USES YOUR INFORMATION

(a) General Use. In general, **the App** uses your personal information to respond to your requests as submitted through the **Services**, to provide you with the **Services** you request, and to help serve you better. **The App** uses your personal information in the following ways:

- facilitate the creation of, secure and maintain your account;

- identify you as a legitimate user in **our** system;
- provide improved administration of the **Services**;
- provide the **Services** you request;
- improve the quality of experience when you interact with the **Services**;
- send you administrative e-mail and/or push notifications, such as security or support and maintenance advisories; and
- send surveys, offers, and other promotional materials related to the **Services**.

(b) Compliance and protection. We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
- protect our, your or others' rights, privacy, safety, or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements and internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate, and deter fraudulent, harmful, unauthorized, unethical, or illegal activity, including cyberattacks and identity theft.

(c) Creation of Non-Identifiable Data. **The App** may create de-identified information records from personal information by excluding certain information (such as your name) that makes the information personally identifiable to you. **We** may use this information in a form that does not personally identify you to analyze request patterns and usage patterns to enhance **our** products and services. **We** reserve the right to use and disclose non-identifiable information to third parties in its discretion.

## DISCLOSURE OF YOUR PERSONAL INFORMATION

**We** disclose your personal information as described below.

(a) At the Direction of **Your Financial Institution**. **We** may share your information with **Your Financial Institution** or with third parties at the direction of **Your Financial Institution**. Other than as described in this Privacy Policy in connection with the **Services**, this Privacy Policy does not apply to the processing of your information by **Your Financial Institution** or third parties with whom **We** share information at **Your Financial Institution's** direction.

(b) Third Party Service Providers. **We** may share your personal information with third party or affiliated service providers that perform services for or on behalf of **Us**, for the purposes described in this Privacy Policy, including: to provide you with the **Services**; to conduct quality assurance testing; to facilitate the creation of accounts; to optimize the performance of the **Services**; to provide technical support; and/or to provide other services to **the App**.

(c) Corporate Restructuring. **We** may share some or all of your personal information in connection with or during negotiation of any merger, financing, acquisition, or dissolution transaction involving the sale, transfer, divestiture, or disclosure of all or a portion of **our** business or assets. In the event of an insolvency, bankruptcy, or receivership, personal information may also be transferred as a business asset. If **our** company, business, or assets is acquired by another company, that company will possess the

personal information collected by **Us** and the company will assume the rights and obligations regarding your personal information as described in this Privacy Policy.

(d) Authorities and Others. Regardless of any choices you make regarding your personal information, **the App** may disclose your personal information to law enforcement, government authorities, and private parties, for the compliance and protection services described above.

## **LINKS TO OTHER SITES**

**The App** may contain links to third party websites. When you click on a link to any other website or location, you will leave **the App** and go to another site and another entity may collect personal and/or anonymous information from you. **The App's** provision of a link to any other website or location is for your convenience and does not signify **our** endorsement of such other website or location or its contents. **We** have no control over, do not review, and cannot be responsible for, these outside websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these outside websites. **We** encourage you to read the privacy policy of every website you visit.

## **YOUR CHOICES REGARDING YOUR INFORMATION**

You have several choices regarding use of information on the **Services**.

(a) How **We** Respond to Do Not Track Signals. Some web browsers transmit "do not track" signals to the websites and other online services with which your web browser communicates. There is currently no standard that governs what, if anything, websites should do when they receive these signals. **We** currently do not take action in response to these signals. If and when a standard is established, **We** may revise its policy on responding to these signals.

(b) Access, Update, or Correct Your Information. You can access, update, or correct your information by changing preferences in your account. For additional requests, please contact **Your Financial Institution** on whose behalf **We** are providing the **Services** to you.

(c) Opting Out of Email or SMS Communications. If you have signed-up to receive our email marketing communications, you can unsubscribe any time by clicking the "unsubscribe" link included at the bottom of the email or other electronic communication. Alternatively, you can opt out of receiving marketing communications by contacting **Us** at the contact information under "Contact Us" below. If you provide your phone number through the **Services**, **We** may send you notifications by SMS, such as provide a fraud alert. You may opt out of SMS communications by unlinking your mobile phone number through the **Services**.

(d) Opting Out of Location Tracking. If you initially consented to the collection of geo-location information through the **Services**, you can subsequently stop the collection of this information at any time by changing the preferences on your mobile device. Please note, however, that if you withdraw consent to **our** collection of location information, you may no longer be able to use some features of the **Services**.

## **SAFEGUARDS AND RETENTION**

**We** implement reasonable administrative, technical, and physical measures in an effort to safeguard the information in our custody and control against theft, loss and unauthorized access, use, modification, and disclosure. Nevertheless, transmission via the internet is not completely secure and **We** cannot guarantee the security of your information.

## **A NOTE ABOUT CHILDREN**

The **Services** are not directed towards individuals under the age of eighteen, and **We** do not intentionally gather personal information about visitors who are under the age of eighteen. If a child under eighteen submits personal information to **Us** and **We** learn that the personal information is the information of a child under eighteen, **We** will attempt to delete the information as soon as possible.

## **PRIVACY POLICY UPDATES**

This Privacy Policy is subject to occasional revision. **Your Financial Institution** may notify you, in their sole discretion, of any material changes in **its** collection, use, or disclosure of your personal information by posting a notice on the **Services**. Any material changes to this Privacy Policy will be effective thirty (30) calendar days following notice of the changes on the **Services** or immediately where no notice is given. These changes will be effective immediately for new users of the **Services**. If you object to any such changes, you must notify **Us** prior to the effective date of such changes that you wish to deactivate your account. Continued use of the **Services** following notice of any such changes (or use of the **Services** after any such changes) shall indicate your acknowledgement of such changes.

## **CONTACT US**

If you have any questions or complaints about this Privacy Policy or **The App's** data collection or processing practices, or if you want to report any security violations to **Us**, please contact **Us** by email at: [rib1@riegelfcu.org](mailto:rib1@riegelfcu.org) or by mail at:

**Riegel Federal Credit Union**  
**515 Milford-Warren Glen Road**  
**Milford, NJ 08848**