Introduction

Wright-Patt Credit Union, Inc. together with its subsidiaries and affiliates (collectively "Credit Union", "we", "us" or "our"), strives to serve your needs and to protect your identity and information we collect about you while providing you services. This Online Privacy Policy is an addendum to our general Privacy Policy, and:

- addresses our privacy practices to render online services when you visit any mobile or online Site or application that we own, including but not limited to, our public Site (wpcu.coop) and our mobile apps (WPCU Mobile Banking, aka Wright-Patt CU Mobile Banking) and (WPCU Treasury Management) ("Sites");
- describes the categories of personally identifiable information ("Personal Information") that we may collect about you when you visit or interact with our Sites;
- describes the categories of other entities with whom we may share your Personal Information;
- discloses whether other parties may collect Personal Information about your online activities over time and across different websites when you use our Sites;
- describes the way you can review and request changes to any of your Personal Information we collect;
- describes how we will inform you of important changes to our Privacy Policy;
- discloses how we respond to web browser "do not track" signals or other opt-out mechanisms;
- describes how we safeguard children's privacy;
- makes clear that no action on your part is needed; and
- links to a California-specific description of consumers' privacy rights.

Please also refer to our Electronic Services Agreement and Disclosure Statement a.k.a. the Mobile and Online Banking Agreement for more information.

User Data We Collect

We collect Personal Information only as allowed by law. To provide online services to you, we may collect Personal Information when you enter data into an application for new products or services or when you use our Sites, products, and services. Personal Information may include your name, home or physical address, Social Security Number, telephone numbers, communications with us, email addresses, your login session, user information, information about any recipient that you may be transacting with via our services, geolocation, IP address, keystrokes, website interactions, and device identifiers. You represent that you have the right to provide such Personal Information and that you give us the right to use the Personal Information in accordance with our Privacy Policy.

How We Use Data We Collect

We only use your Personal Information for certain purposes allowed by law (refer to Privacy Policy), which you cannot limit. We may share your Personal Information with affiliates and third parties in accordance with the practices set forth in our Privacy Policy, including to deliver services to you. We do not and will not sell your Personal Information. We may use or share data that we collect for future reference. This includes but is not limited to trends analysis, marketing purposes, application functionality, and troubleshooting issues, either internally or per your request. See "Sharing Data with Third-Parties" for more information.

Sharing Data with Third-Parties

We work with various third-party companies to provide convenient services on our Sites. These companies may also work with their own vendors to help provide services to us which we may in turn provide to you. These vendors include but are not limited to vendors who create and maintain our Sites. To provide these services, we must share certain Personal Information about you, your accounts, and about any recipient that you may be transacting with via our services. You represent that you have the right to provide such Personal Information and that you give us the right to use the Personal Information in accordance with our Privacy Policy.

In addition to sharing your data with third parties, we may also disclose Personal Information, as permitted by law, and: (1) consistent with our Privacy Policy and other account disclosures; (2) to comply with applicable laws; (3) per government requests; (4) to comply with subpoenas or other legal requests and proceedings; (5) for security purposes and to protect our customers, Sites, brand, or other legal interests.

Keeping Your Information Accurate

It is important that we have accurate information about you. If you notice that your Personal Information is incomplete, inaccurate, or out of date, please contact our Member Help Center at #800-762-0047 or visit a Member Center near you. You can also review and request changes to certain Personal Information through Online or Mobile Banking.

How You Can Control Your Information

Our Sites are designed for optimal viewing with cookies enabled (cookies are small files that collect internet data). 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. Please note that due to a lack of consistent standards across browsers, our sites may not respond to “do not track” browser settings.

Children’s Privacy

The privacy of our young members and other young visitors to our Sites is of great importance to us. We do not knowingly collect Personal Information from individuals under the age of 13, outside of members who have enrolled in Mobile and Online Banking with the consent from a parent or legal guardian. Under the Children’s Online Privacy Protection Act and implementing rule, parents have the right to review, and request deletion of information collected about their children (under the age of 13) when the information is collected online. If parents want to review the information collected about their child, please visit a Member Center near you, write to us at 3560 Pentagon Boulevard, Beavercreek, Ohio 45431, call us at (937) 912-7000 or (800) 762-0047, or email us at contactus@wpcu.coop.

Security Practices

We take the security of your Personal Information and the information you provide to us very seriously. We have multiple safeguards in place to protect the Personal Information that you provide and that we collect and share. Please also take your own steps to educate yourself on threats and scams to prevent fraudulent use of your account. No one at the Credit Union will know or need to know your password, and Credit Union employees will never ask for your password.

Although we do not share Personal Information with nonaffiliated third parties except as provided in our Privacy Policy, we are aware that you may choose to do so to use the services of others. For example, you may have provided your account information to an account aggregation service (that consolidates your financial information from different sources), making payments via mobile applications, or for tax preparation. Because these third parties have access to your Personal Information and account data and may use your account sign-in credentials to provide the services, we recommend you use caution when granting such access to third parties. 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 knowingly provide your 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. If you revoke the authority you have to a third party, we recommend that you change your password.

Policy Updates

We may change our policy from time to time. When we do, changes will be effective by posting to our website, wpcu.coop. Any changes to our policy will become effective when posted unless indicated otherwise.

Notice for California Residents

If you are a California resident, please refer to our California Consumer Privacy Notice for additional information about your rights under the California Consumer Privacy Act of 2018.