

ONLINE PRIVACY POLICY

The Effective Date of this Online Privacy Policy is **June 1, 2024**.

We understand that privacy is exceptionally important to our members. The purpose of this Online Privacy Policy is to plainly and transparently disclose to you how we collect, use and share information, and how we attempt to safeguard the data you provide to us whether through the Summit Credit Union (Summit website, www.summitcreditunion.com (“Website”) or our mobile application (“Summit Mobile App”).

We are committed to securing data that we collect concerning you (“**you**”) and complying with applicable data protection and privacy laws.

THIS ONLINE PRIVACY POLICY IS LEGALLY BINDING. BY USING OUR WEBSITE, THE SUMMIT MOBILE APP OR BY PROVIDING ANY INFORMATION TO US, DIRECTLY OR INDIRECTLY, YOU AGREE TO BE BOUND BY ALL OF THE TERMS OF THIS ONLINE PRIVACY POLICY. WE RESERVE THE RIGHT TO CHANGE OUR ONLINE PRIVACY POLICY FROM TIME TO TIME, AND IT IS YOUR RESPONSIBILITY TO ENSURE YOU AGREE TO THE TERMS PRIOR TO USING OUR SITES OR PROVIDING INFORMATION TO US. IF YOU DO NOT AGREE TO THIS ONLINE PRIVACY POLICY, DO NOT USE OUR WEBSITE, OUR SUMMIT MOBILE APP OR PROVIDE INFORMATION TO US.

1. **PROTECTING YOUR PRIVACY GENERALLY.** We take measures to monitor and update our privacy and data collection and storage policies and procedures to consistently meet or exceed industry security standards.
 - A. Server Location. Our servers are located in the United States. Any information collected through our Website is stored and processed in the United States, and you acknowledge this.
 - B. Industry-Standard Protection. We utilize industry-standard security measures to safeguard the information we collect, maintain and use. However, Summit Credit Union does not guarantee the performance or adequacy of such security measures.
 - C. Limitation on Access. Access to any personal information we collect and store is generally restricted to those employees and/or contractors who require it to perform a job or other contracted function, except as described in Section 3 below.
 - D. 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. Summit

Credit Union is committed to protecting the online privacy of the children who visit our site and complying with COPPA.

Hence, this 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.

2. **COLLECTION OF INFORMATION.** We collect and process the following information about you:

A. **Information you give to us.** You provide information to us when you enter data into applications for products and services or otherwise disclose it to Summit Credit Union whether electronically or in person.

You may interact with us in a variety of ways online, including through a mobile device. The mobile application may collect information from your mobile device's camera if you grant such access. We may offer sites or applications that permit browsing and do not require registration. We may also offer the ability to access your Summit Credit Union 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:

- i. Your name;
- ii. Your address;
- iii. An e-mail address;
- iv. A telephone number;
- v. A tax identification number;
- vi. Other identifiers that enable physical or electronic contact with you;
- vii. Data resulting from your activity, such as transaction information;
- viii. The camera on your mobile device;
- ix. Limited location information (e.g., a zip code to help you find a nearby ATM); and
- x. The contact list on your mobile device in order to facilitate certain features within the application including, but not limited to, Zelle, Mobile Lending, and Bill Pay.

B. **Information we collect automatically.** Each time you visit our Website, we may automatically collect the following information: technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, location information, time zone setting, browser plug-in types and versions, operating system and platform; device identification codes; and information about your visit, including the full Uniform Resource Locators (URL)

clickstream to, through and from our site (including date and time), pages you looked at or searched for, and the products and services you have viewed, ordered or searched including, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call us.

This information will be used in accordance with the purposes described in this Online Privacy Policy and in any applicable privacy notice provided to you at the time at which it was collected.

- C. Card Controls App. The Card Controls app periodically collects, transmits, and uses geolocation information to enable features that prevent fraudulent card use and send alerts, but only if the End User expressly authorizes collection of such information. Geolocation information can be monitored on a continuous basis in the background only while the Solution is being used or not at all, depending on the End User's selection. End Users can change their location permissions at any time in their device settings.

3. **HOW WE USE INFORMATION COLLECTED.** We use the information described in Section 2 above in a number of ways, such as:

- To process applications and transactions;
- To send you important information regarding the Website, the Summit Mobile App and changes to terms and conditions to accessing products and services and/or Summit Credit Union policies;
- To verify your identity (such as when you access or change 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;
- For joint marketing with other financial companies;
- To allow you to participate in surveys, sweepstakes, contests and similar promotions;
- To prevent fraud and improve Website and Summit Mobile App security; and
- For our business purposes, including developing and improving our products and services, and enhancing our Website.

4. **COOKIES.** To provide better service and a more useful Website, we use "cookies" as part of our interaction with your browsers. "Cookies" are pieces of information in small text files that are transferred 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 and some Website features and online products and services may not operate as intended.

We use cookies on parts of the Website or Summit Mobile App 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.

5. **THIRD PARTY SECURITY CHECKS.** To protect you, we may use tools and services provided by third-parties to help us decide whether to accept submissions from personal computers, mobile phones, or other devices. These third-party providers may check whether user devices have been identified with fraudulent or abusive transactions in the past, such as reported instances of identity theft, account takeovers, or malware attacks. For this purpose, a cookie, flash storage token, or other code file may be placed on your device to identify it in the future when you visit our Website or connect with our other online applications. If you set your browser or device to reject these cookies or tokens, you may not be able to access some features of our Website or other online applications.

When you access our Website or other online applications, we will transmit this third-party device identification code to the third-party provider, along with data concerning certain technical attributes of your device such as the model, operating system, and browser version, as well as the IP address (all of which are used to confirm device identification). We may then receive information from these third-party providers indicating that submissions from a user's device should not be accepted. We may also inform such third-party providers if we determine that a device has been used in connection with a fraudulent or abusive transaction with us. In addition, in certain situations, we may share with one or more of these third-party providers certain personal identifying information and information about the device you are using. If you receive a message from us indicating that a requested submission has not been processed, we will provide appropriate customer service contact information.

6. **WEBSITE ANALYTICS USE.** We use website analytics tools to collect information about use of this site across devices. We have implemented tools that allow us to serve you relevant advertising on third party websites if you have visited our Website, however accessed, but does not personally or directly identify you. These tools also allow us to manage our advertising and collect information about your visit to our Website.
7. **SHARING OF INFORMATION.** If you are a Summit Credit Union member, we may use and share any information that we collect from or about you in accordance with applicable federal and state laws and 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. This may include, for example, 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.

8. **LINKS TO THIRD-PARTY WEBSITES.** Our Website may contain links to third-party websites. Although these links were established to provide you with access to useful information, Summit Credit Union does not control and is not responsible for any of these websites or their content. We do not know or control what information third-party websites may collect that may include personal information. Summit Credit Union is providing these links to you only as a convenience, and Summit Credit Union 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 Summit Credit Union Website so that you can understand how those websites collect, use, and share your information. Summit Credit Union is not responsible for the security or privacy practices of the linked websites.
9. **SECURING YOUR PERSONAL INFORMATION.** Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Site, you are responsible for keeping this password confidential. We recommend that you do not provide your password to any other person or entity. The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Website; any transmission is at your own risk.
10. **HOW TO CONTACT US.** Please contact us at any time with any questions or concerns about this Online Privacy Policy, or to exercise any of your rights under this Online Privacy Policy or applicable law or to review or update your contact information we have from you, such as your email address, mailing address or telephone number.

Email us at: memberservice@summitcreditunion.com

Mail us, stop in or call us at: 1709 Landmark Drive
Cottage Grove, WI 53527
(800) 236-5560

11. **GOVERNING LAW & JURISDICTION.** This Online Privacy Policy, and Summit Credit Union's collection and use of member information, shall be governed and interpreted in accordance with the laws of the United States and the State of Wisconsin. Venue for any cause of action hereunder shall lie exclusively in Dane County, Wisconsin.
12. **CHANGES TO THIS ONLINE PRIVACY POLICY.** We reserve the right to change the terms of this Online Privacy Policy. Any changes to our Online Privacy Policy will be placed here and will supersede this version of our Online Privacy Policy. By continuing to use our Website, you agree to the terms of this and any updated versions of this Online Privacy Policy.