

CALIFORNIA ONLINE PRIVACY PROTECTION POLICY
LAST UPDATED: 02/2022

This California Online Privacy Protection Policy (Privacy Policy) explains how Heritage South Community Credit Union (HSCCU) collects, uses, and discloses the personal information of California consumers covered by the California Online Privacy Protection Act of 2003 (CalOPPA).

As used in this notice, the words “we”, “us”, “our”, or “Credit Union” mean HSCCU and the words “you”, “your”, and “consumer” mean California consumers as defined in the CalOPPA.

Please read this notice carefully to understand our policies and practices regarding your personal information and how we will treat it. This notice is provided pursuant to the CalOPPA.

This Disclosure applies to California consumers. Under the CalOPPA, a ‘consumer’ is a natural person who is a California resident, and who seeks or acquires goods, services, money, or credit for personal, family, or household purposes. Any terms defined in the CalOPPA have the same meaning when used in this notice. HSCCU’s Privacy Notice can be found at <https://www.heritagesouth.org>. Furthermore, the CalOPPA shall not restrict HSCCU’s ability to comply with any federal, state, or local laws.

Definitions: For the purposes of this Privacy Policy:

- "Account" means a unique account created for You to access our Service or parts of our Service.
- "Cookies" are small files that are placed on Your computer, mobile device, or any other device by a website, containing the details of Your browsing history on that website among its many uses.
- "Device" means any device that can access the Service such as a computer, a cell phone, or a digital tablet. ● "Do Not Track (DNT)" is a concept that has been promoted by US regulatory authorities, in particular the U.S. Federal Trade Commission (FTC), for the Internet industry to develop and implement a mechanism for allowing internet users to control the tracking of their online activities across websites.
- "Personal Data" is any personally identifiable information.
- "Service" refers to the Heritage South Community Credit Union website, online banking service, and mobile banking application.
- "Service Provider" means any natural or legal person who processes the data on behalf of HSCCU. It refers to third-party companies or individuals employed by HSCCU to facilitate the Service, to provide the Service on behalf of HSCCU, to perform services related to the Service or to assist HSCCU in analyzing how the Service is used.

- "Usage Data" refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- "Website" refers to Heritage South Community Credit Union, accessible from <https://www.heritagesouth.org/>
- "You" means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

Collecting and Using Your Personal Data: While using Our Service, We may ask You to provide Us with personally identifiable information that can be used to contact or identify You. The categories of personally identifiable information may include, but is not limited to:

- A first and last name
- A home or other physical address, including street name and name of a city or town
- Email Address
- A telephone number
- A social security number
- Any other identifier that permits the physical or online contacting of a specific individual
- Information concerning a user that the Website or Service collects online from the user and maintains in personally identifiable form in combination with an identifier as described in this Policy

You may choose to include more personally identifiable information when you use certain services on our site.

Usage Data: Usage Data is collected automatically when using the Service. Usage Data may include information such as Your device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers, and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers, and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

Tracking Technologies and Cookies: We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Service. The technologies We use may include:

- **Cookies or Browser Cookies:** A cookie is a small file placed on Your device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Service. Unless you have adjusted Your browser setting so that it will refuse Cookies, our Service may use Cookies.
- **Web Beacons:** Certain sections of our Service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit HSCCU, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser.

We use both Session and Persistent Cookies for the purposes set out below:

- **Necessary / Essential Cookies:**
 - **Type:** Session Cookies
 - **Administered by:** Us
 - **Purpose:** These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.
- **Cookies Policy / Notice Acceptance Cookies:**
 - **Type:** Persistent Cookies
 - **Administered by:** Us
 - **Purpose:** These Cookies identify if users have accepted the use of cookies on the Website.
- **Functionality Cookies:**

- Type: Persistent Cookies
 - Administered by: Us
 - Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.
- Tracking and Performance Cookies:
 - Type: Persistent Cookies
 - Administered by: Third-Parties
 - Purpose: These Cookies are used to track information about traffic to the Website and how users use the Website. The information gathered via these Cookies may directly or indirectly identify you as an individual visitor. This is because the information collected is typically linked to a pseudonymous identifier associated with the device you use to access the Website. We may also use these Cookies to test new pages, features, or new functionality of the Website to see how our users react to them.

For more information about the Cookies we use and your choices regarding Cookies, please visit the 'Using Cookies' section of our Online Privacy Policy.

Use of Your Personal Data: We may use Personal Data for the following purposes:

- To provide and maintain our Service, including to monitor the usage of our Service.
- To manage Your Account: to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.
- To contact You: To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- To provide You with news, special offers and general information about other goods, services, and events which we offer that are related to products and services that you already have or enquired about unless You have opted not to receive such information.
- To manage Your requests: To attend and manage Your requests to Us.

- For business transfers: We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us about our Service users is among the assets transferred.
- For other purposes: We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing, and your experience.

We may share Your personal information in the following situations:

- With Service Providers: We may share Your personal information with Service Providers to monitor and analyze the use of our Service, for payment processing, to contact You.
- For business transfers: We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.
- With business partners: We may share Your information with Our business partners to offer You certain products, services, or promotions.
- With other users: when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.
- With Your consent: We may disclose Your personal information for any other purpose with Your consent.

Retention of Your Personal Data: HSCCU will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data 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.

HSCCU will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

Transfer of Your Personal Data: Your information, including Personal Data, is processed at HSCCU's operating offices 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 Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

HSCCU will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

Disclosure of Your Personal Data: If HSCCU is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

Under certain circumstances, HSCCU may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

HSCCU may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Credit Union
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

Security of Your Personal Data: The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

"Do Not Track" Policy as Required by California Online Privacy Protection Act (CalOPPA): Our Service does 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 DNT by visiting the preferences or settings page of Your web browser.

Children's Privacy: We do not knowingly collect Personal Information from individuals under the age of 13. To learn more about our Children's Online Privacy Policy please visit our website: <https://www.heritagesouth.org/privacy-policy#children>

Links to Other Websites: Our Service may contain links to other websites that are not operated by Us. If You click on a third-party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies, or practices of any thirdparty sites or services.

Sale of Personal Information: In the past 12 months, HSCCU has not sold personal information subject to the CalOPPA for monetary or other valuable consideration, including personal information of minors under the age of 13. HSCCU does not sell personal information subject to the CalOPPA of any consumer regardless of age.

Changes to this Privacy Policy: We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page. We will let You know via email and/or a prominent notice on Our Service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us: If you have any questions about this Privacy Policy, You can contact us:

- By visiting this page on our website: <https://www.heritagesouth.org/contact-us>
- By phone: 931-680-1400
- By visiting a branch office during normal business hour