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## ONLINE PRIVACY POLICY

Travis Credit Union (TCU) is committed to maintaining the privacy of everyone who visits and submits information through this website. This Online Privacy Policy (Policy) only relates to the information we collect online through [traviscu.org](http://traviscu.org), our online banking platform and mobile banking application (collectively, the Sites). By using any of the Sites, you consent to this Policy. We reserve the right to change this policy in the future by posting notice at this site. The following is a summary of the information we collect and what we do with it. This summary is in addition to Travis Credit Union's Federal Privacy Policy, available at <https://www.traviscu.org/privacy-policy>.

We will use and share any information that we collect from or about you in accordance with that Federal Privacy Policy.

### **Information Collected Within Our Website**

Very generally speaking, through your visits to these sites we gather only the information you choose to share, we use that information only in order to provide programs or services that you specifically ask for or to make you aware of programs or services that TCU offers, and we do not share your information with others.

For site security purposes and to ensure that this service remains available to all users, TCU employs software programs to monitor website traffic to identify unauthorized attempts to upload or modify information, or otherwise cause damage. TCU also uses software programs to collect statistical information about the use of our website and applications contained therein. Programs are used to create summary statistics, which are used for such purposes as assessing what information is of most and least interest, determining technical design specifications, and identifying system performance or problem areas. No personal information, such as your name or address is collected or used for this analysis. Any data automatically stored is kept as the confidential records of the credit union and is not sold or distributed in part or whole to any third party. Regarding "Do Not Track" signals, TCU does not use tracking information or pass this type of information to third parties. Travis Credit Union's web server automatically recognizes only your IP address when you visit our site. It does not recognize your email address or other personal information.

### **Online Banking and Online Application Security**

When you use Travis Credit Union Online Banking or apply online for accounts, you provide personal information that is necessary for us to securely process your request. To ensure that your information remains confidential, all sessions are established with Secure Socket Layer (SSL). SSL encrypts and decodes all data transmitted only between your browser and Travis Credit Union.

One of the basic tools used to ensure internet security is encryption. Encryption is used any time personal information is exchanged. Encryption works much the same as a combination lock. TCU uses many security controls to ensure that your information in our files and computers is protected from unauthorized access. All of our systems are secured with multiple layers of encryption, firewalls, redundant screening, and filtering routers.

For additional security Travis Credit Union has implemented multi-factor authentication (MFA) for all Online Banking members. When you log into your Online Banking account, MFA places a secure cookie on your computer. The secure cookie, in conjunction with your name and password, provide multiple methods of authenticating your identity. Cookies cannot be used to learn confidential or personal information about you that you have not already provided or obtain information from your device. We do not disclose information that you submit through this site and that is personally identifiable with you to any other person or entity except as legally compelled to do so, such as through a subpoena.

### **E-mail Communications**

Your e-mail address will be kept confidential at all times. If you are sending an e-mail to TCU, we want to remind you that e-mail is not necessarily secure against interception. If your information is very sensitive, or includes personal or confidential information, such as your account number, credit card number, or social security number, you can login into Online Banking and send a secure message to one of our member representatives.

### **What are cookies and how does Travis Credit Union use them?**

Travis Credit Union (“We”) employ the use of “Cookies”. Cookies are small files containing limited data that are created when you access our Sites. Cookies can be accessed by our Sites to enhance your use of our Sites and their functionality. We use cookies to provide you with an improved and a more personalized online service. Also, without revealing your identity, cookies help us confirm your identity and help us keep your transactions with us secure when you do your banking online. We also use cookies for various administrative purposes such as: maintaining continuity during online sessions, gathering data about the use of our Sites and/or monitoring our online promotions. This information and/or data helps us inform you about additional products, services or promotions that may be of interest to you.

We do not use or associate personally identifiable information (such as your name, address or email address) with cookies and cookies do not reveal personal information. You can choose to set your web browser to inform you when cookies are set and turn on or turn off cookies by adjusting the appropriate settings on your browser. To turn your cookies off, please use the HELP menu of your browser to provide you with additional information. If you do turn off your cookies, you may find your use of the internet or our Sites are impaired or otherwise limited and most if not all of our online banking features will not work.

Some of our business partners or associates (for example, advertisers) may use cookies on our Site. However, we have no access to or control over those cookies. In conjunction with our use of Google AdWords, Google or third-party vendors that they use, our business partners or associates may show our advertisements on websites across the internet. Google may also use cookies to deliver advertisements to you based on your past visit(s) to our Sites. You may opt out of Google’s use of cookies by visiting Google’s Ad Setting at <https://adssettings.google.com/anonymous> or opt-out of a third party vendor’s use of cookies by visiting the Network Advertising Initiative Opt-Out Page at <https://optout.networkadvertising.org/>

## **Social Media and Advertising**

Pixel tags (a.k.a. pixel tracking) are short lines of code placed on our website and can be used with cookies. Pixels track anonymized activity for marketing campaigns, such as when visitors complete an action on our website after viewing or interacting with an advertisement. When a visitor views or interacts with advertising, a pixel/cookie is placed on that visitor's browser, and relevant information is recorded then aggregated as anonymized metrics for reporting purposes such as analyzing consumers' collective online behavior and measuring website and advertising effectiveness.

Travis Credit Union does not and cannot retrieve any personal visitor information using pixel tags because the only information we receive is aggregated and anonymized. We use pixel tracking to learn from actions taken on our website, such as a visitor's randomized cookie number, time, date, duration, number of page views, description of the page where the tag is placed, and additional details regarding relevant transactional activities. Travis Credit Union works with privacy-compliant service providers that help us track, collect, and analyze this anonymized information.

Advertising cookies collect information to tailor advertising to your interests. Data collected via browsers through cookies is stored for up to 60 days. Data collected via mobile devices is stored for up to 180 days. Our systems typically reset the retention period each time we encounter the same visitor. Declining these cookies may result in seeing advertising that is not as relevant to you but does not interfere with our website's functionality and visitor intent.

Your browser can help you manage cookies. Additionally, you can adjust your advertising preferences on your mobile device. General resources for opting out of interest-based advertising are available from the [Network Advertising Initiative](#) and the [Digital Advertising Alliance](#).

## **Google Analytics**

Travis Credit Union does use Google Analytics to understand how visitors engage with our website. We do not use Google Analytics to track, collect or upload any data that personally identifies an individual (such as name, address or email address) or other data which can be reasonably linked to such information by Google. We do not receive personally identifiable information about users on our Sites. For information on how Google uses the data it collects and how to control the information sent to Google, please visit [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners).

## **Google AdWords**

We also use Google AdWords for online marketing purposes. Google AdWords allows us to advertise our Sites. In the future, we may use Google AdWords for additional features, such as to "remarket", which means that we are able to reach people who previously visited our Sites. We may use Google AdWords to reach target audiences based on Google AdWords features. For example, we may use it to reach users based on specific interest categories, similar audiences, or use other types of interest-based advertising and demographic and location targeting. We gather information about users for advertising and remarketing purposes through the use of Google AdWords, but we do not collect personally identifiable information (such as your name, address, or email address) for advertising purposes, and we do not share personally identifiable information with Google.

**Children's Online Privacy Protection Act Disclosure**

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. TCU is committed to protecting the online privacy of the children who visit our Sites and complying with COPPA.

We do not knowingly market to or solicit information from children under 13, nor do we post offensive material that is harmful to children. We recognize that protecting children's identities and privacy online is important and that the responsibility to do so rests with both the online industry and with parents.

We encourage parents and legal guardians to supervise the activities of children when using websites.

We are not responsible for the data collection and use practices of non-affiliated third parties to which our websites may link.

**Links to Other Sites**

Our Site(s) may contain links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our Site(s) to reach the privacy statements of any other site that collects personally identifiable information.

**Contact Information**

If you have any questions at all about, or related in any way to, our Online Privacy Policy, please call the Travis Credit Union Member Service Center at **(707) 449-4000** or **(800) 877-8328**, or e-mail us anytime using Secure Messaging within Online Banking. Your privacy is very important to us.