

Your privacy is important to us. This Online Privacy Policy explains how we collect, share, use, and protect information when you visit or use this online service and any other online services offered by Valley First Credit Union. This policy covers Valley First's online services, including the Valley First website, Valley First Online & Mobile Banking, and Valley First branded social media sites or pages, as well as any interactions you may have while viewing content provided through one of Valley First's digital advertising campaigns.

As you review this Online Privacy Policy, here are a few general principles to keep in mind:

- Our online services are intended for a U.S. audience. If you visit or use one of our online services, your information will be processed in the United States.
- Our online services are not intended for children under 13. We do not knowingly collect personal information from children under 13 without parental consent.
- If you have a financial product or service with us, we will use and share any information that we collect from or about you in accordance with our [Federal Privacy](#) and [California Privacy](#) Notices, which offer you certain choices with respect to the use and sharing of your personal information.
- Valley First Online & Mobile Banking and our social media sites or pages may have additional terms from this policy about the privacy of your information. Please review the privacy policy for the specific online service you are using.

Information We Collect

Personal Information

When you visit or use our online services, we may collect personal information from or about you such as your name, email address, mailing address, telephone number(s), account numbers, limited location information (for example, a zip code to help you find a nearby ATM), user name and password. We may also collect payment card information, social security numbers, driver's license numbers (or comparable) when you provide such information while using our online services and where we believe it is reasonably required for ordinary business purposes.

Usage and Other Information

In addition to the personal information described above, we may collect certain information about your use of our online services. For example, we may capture the IP address of the device you use to connect to the online service, the type of operating system and browser you use, and information about the site you came from, the parts of our online service you access, and the site you visit next. We or our third-party partners may also use cookies, web beacons or other technologies to collect and store other

information about your visit to, or use of, our online services. In addition, we may later associate the usage and other information we collect online with personal information about you.

Valley First Online & Mobile Banking

For your convenience, Valley First offers you the ability to access some of our products and services through mobile applications and mobile-optimized websites (“Valley First Online & Mobile Banking”). When you interact with us through Valley First Online & Mobile Banking, we may collect information such as unique device identifiers for your mobile device, your screen resolution and other device settings, information about your location, and analytical information about how you use your mobile device. We may ask your permission before collecting certain information (such as precise geo-location information) through Valley First Online & Mobile Banking.

Additional Sources of Information

We may also collect information about you from additional online and offline sources including from co-branded partner sites or commercially available third-party sources, such as credit reporting agencies. We may combine this information with the personal and other information we have collected about you under this Online Privacy Policy.

Use of Information

We use the information discussed above in a number of ways, such as:

- Processing applications and transactions
- Verifying your identity (such as when you access your account information)
- Preventing fraud and enhancing the security of your account or our online services
- Responding to your requests and communicating with you
- Managing your preferences
- Performing analytics concerning your use of our online services, including your responses to our emails and the pages and advertisements you view
- Providing you tailored content and marketing messages
- Operating, evaluating and improving our business (including developing new products and services; improving existing products and services; performing data analytics; and performing accounting, auditing and other internal functions)
- Complying with and enforcing applicable legal requirements, relevant industry standards, contractual obligations and our policies
- For any other purposes that we may specifically disclose at the time you provide or we collect your information

We may also use data that we collect on an aggregate or anonymous basis (such that it does not identify any individual customers) for various business purposes, where permissible under applicable laws and regulations.

Disclosure of Information

We may share the information we collect from, and about, you with affiliates and other third parties. For example, we may share your information with:

- Valley First third-party service providers
- Other companies to bring you co-branded services, products or programs
- Other third parties to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights, or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third parties.

Where appropriate, we will limit sharing of your information in accordance with the choices you have provided us in response to our U.S. Consumer Privacy Notice.

We may share anonymous or aggregated information with third parties to help deliver products, services, and content that are tailored to the users of our online services and for other purposes.

Understanding Cookies, Web Beacons and Other Tracking Technologies

We, or our service providers, and other companies we work with may deploy and use cookies, web beacons, local shared objects and other tracking technologies for various purposes, such as fraud prevention and monitoring our advertising and marketing campaign performance. Some of these tracking tools may detect characteristics or settings of the specific device you use to access our online services.

“Cookies” are small amounts of data a website can send to a visitor’s web browser. They are often stored on the device you are using to help track your areas of interest. Cookies may also enable us or our service providers and other companies we work with to relate your use of our online services over time to customize your experience. Most web browsers allow you to adjust your browser settings to decline or delete cookies, but doing so may degrade your experience with our online services.

Clear GIFs, pixel tags or web beacons—which are typically one-pixel, transparent images located on a webpage or in an email or other message—or similar technologies may be used on our sites and in some of our digital communications (such as email or other marketing messages). They may also be used when you are served advertisements or you otherwise interact with advertisements outside of our online

services. These are principally used to help recognize users, assess traffic patterns and measure site or campaign engagement.

Local Shared Objects, sometimes referred to as “flash cookies” may be stored on your hard drive using a media player or other software installed on your device. Local Shared Objects are similar to cookies in terms of their operation, but may not be managed in your browser in the same way. For more information on managing Local Shared Objects, [click here](#).

Valley First Credit Union does not respond to “Do Not Track” signals.

Online advertising

You will see advertisements when you use many of our online services. These advertisements may be for our own products or services (including pre-screened offers of credit) or for products and services offered by third parties. Which advertisements you see is often determined using the information we or our affiliates, service providers and other companies that we work with have about you, including information about your relationships with us (e.g., types of accounts held, transactional information, location of banking activity). To that end, where permitted by applicable law, we may share with others the information we collect from and about you.

Online behavioral advertising (also known as “OBA” or “interest-based advertising”) refers to the practice of collecting information from a computer or device regarding a visitor’s web-browsing activities across non-affiliated websites over time in order to deliver advertisements that may be of interest to that visitor based on their browsing history. Through OBA, we hope to deliver advertisements that are most likely to be of interest to you using information about your other web-browsing activities (e.g., the web pages you visit, search terms you enter, and the way you move through our online services on your computer or device) or your personal profile (e.g., demographic or location information). Certain companies we work with may set cookies and use related tracking technologies, such as the clear GIFs discussed above, throughout our online services or in our communications to support these OBA efforts. If you do not want your information collected and used by the companies we work with for OBA purposes, you can opt out of this form of OBA by following the instructions in the next section.

Opting Out of "Online Behavioral Advertising" (OBA)

There are two (2) ways that you can opt out of OBA from certain Valley First ads on third-party websites. One way is through the cross-industry [Self-Regulatory Program for Online Behavioral Advertising](#) managed by the Digital Advertising Alliance (DAA). To opt out of OBA, please click on the following link and follow the instructions: <http://youradchoices.com>. Another way to opt out of OBA is by clicking on the Advertising Options Icon featured on certain Valley First ads on third-party websites. When clicked it (i) describes the collection and uses of data gathered at the relevant third-party website and (ii) provides a way for you to opt out of data collection and use

by the third parties listed for the purposes of OBA. If you choose to opt out, our service provider will communicate your opt out election to the relevant third-party advertising partners and a cookie will be placed on your browser indicating your decision to opt out.

Bear in mind that because cookies are stored by your browser, if you use different browsers on your computer, or multiple computers and devices that have browsers and you do not wish to have cookies collect information for OBA purposes, you will need to opt out of OBA from each browser on each of the computers and devices that you use. Please note that even if you opt out of OBA, you may still receive advertisements from us; they just won't be customized based on your web-browsing activities on third-party websites.

Linking to Third-Party Websites

Valley First may provide links to websites that are owned or operated by other companies ("third-party websites"). When you use a link online to visit a third-party website, you will be subject to that website's privacy and security practices, which may differ from ours. You should familiarize yourself with the privacy policy, terms of use and security practices of the linked third-party website before providing any information on that website.

Security

We use reasonable physical, electronic, and procedural safeguards that comply with federal and state standards to protect and limit access to personal information. This includes device safeguards and secured files and buildings. Visit our [Privacy & Security Page](#) for additional information about how we protect your Personal Information.

Please note that information you send to us electronically may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential information (such as your Social Security Number) to us.

Updating Your Information

Keeping your account information up-to-date is very important. If you are using our online banking option, you may review, or update certain types of account information by logging in and accessing your profile in the Preferences section. If you cannot change the incorrect information online, or you prefer to request changes offline, please call or write to us using the contact information listed on your account statements, records, or other account materials. You can also visit a branch.

Changes to this Online Privacy Policy

We may change this Online Privacy Policy from time to time. When we do, we will let you know by appropriate means such as by posting the revised policy on this page with

a new "Last Updated" date. Any changes to this Online Privacy Policy will become effective when posted unless indicated otherwise.

Effective Date 10/03/2017