

PRIVACY NOTICE

Effective: September 22, 2023

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1. OVERVIEW

Veridian Credit Union, Veridian Fiscal Solutions, Veridian Group, and Veridian Insurance (collectively, “**Veridian**,” “**we**,” “**us**,” “**our**”) respect your privacy and are committed to protecting the personal data we hold about you. If you have questions, comments, or concerns about this Privacy Notice or our processing of personal data, please see the bottom of this Privacy Notice for information about how to contact us.

This Privacy Notice explains our practices with respect to personal data we collect and process about you. This includes information we collect through, or in association with, our websites with home pages located at <https://www.veridiancu.org>, <https://join.veridiancu.org>, and <https://my.veridiancu.org>, our apps that we may provide, our products and services that we may offer from time to time via our website and/or related apps, our related social media sites, or otherwise through your interactions with us (the website, apps, products, services, and social media pages, collectively, the “**Services**”).

Please review the following to understand how we process and safeguard personal data about you. By using any of our Services, whether by visiting our website or otherwise, and/or by voluntarily providing personal data to us, you acknowledge that you have read and understand the practices contained in this Privacy Notice. This Privacy Notice may be revised from time to time, so please ensure that you check this Privacy Notice periodically to remain fully informed.

2. PERSONAL DATA WE COLLECT

We collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“personal data”). In addition, we may collect data that is not identifiable to you or otherwise associated with you, such as aggregated data, and is not personal data. To the extent this data is stored or associated with personal data, it will be treated as personal data; otherwise, the data is not subject to this notice.

a. How We Use Your Personal Data

We collect and process your personal data as part of our business operations, which include:

1. Providing, predicting, or performing, including maintaining or servicing accounts and loans, providing customer service, processing or fulfilling orders and transactions, verifying customer information, making credit-worthiness decisions, processing payments, and all other aspects of a financial institution and fiscal agent.
2. Marketing our products and services to you, including sending you messages about the products and services we offer, and which are offered by third parties.
3. Communicating with you by email, mail, telephone, and other methods of communication, about products, services, order status, and information tailored to your requests or inquiries.
4. Facilitating your engagement with the Services, including to enable you to participate in our customer feedback surveys, post your experiences, and engage in the live chat function of our website.
5. Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
6. Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
7. Debugging to identify and repair errors that impair existing intended functionality.
8. Short-term, transient use, including, but not limited to, the contextual customization of ads shown as part of the same interaction.
9. Undertaking internal research for technological development and improving the platform experience.
10. Undertaking activities to verify or maintain the quality or safety of the services or devices owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the services or devices owned, manufactured, manufactured for, or controlled by us.
11. Complying with applicable laws, regulations, rules and requests of relevant law enforcement and/or other governmental agencies, or for other purposes, as permitted or required by law.
12. Enforcing our Terms of Service (<https://www.veridiancu.org/terms-of-service>.) and other usage policies.
13. As necessary or appropriate to protect the rights, property, and safety of our users, us, and other third parties.

b. How We Obtain Your Personal Data

We collect your personal data from the following categories of sources:

- **Directly from you.** When you provide it to us directly whether online, by email, phone, or in-person; apply for membership or create an account; we may collect your name, mailing and/or billing address, email, telephone number, date of birth, age, Social Security Number, passport, driver’s license, payment card information, and financial information. In addition, we partner with the Iowa Credit Union to administer a scholarship program and may collect or ask for your high school name, expected graduation date, colleges that you plan to attend and GPA.
- **Automatically or indirectly from you.** For example, through logging and analytics tools (such as Google Analytics, Google Tag Manager, Microsoft Clarity, Meta Pixel, and Decibel), cookies, pixel tags (such as Flynn Wright), and as a result of your use of and access to the Services, or through your interactions with us on social media websites (such as Facebook, Instagram, Twitter, and LinkedIn).

- **From our Service Providers.** For example, credit bureaus, commercial email providers, security consultants, and other Service Providers we engage.
- **From Third Parties.** For example, ad networks, such as Google Display Network, Basis, Amazon Advertising Platform, DoubleClick and Meta Business Manager, to serve advertisements across the Internet. These advertisers use cookies, pixel tags, and other tracking technologies to collect information about your online activity and provide online behavioral advertising.

c. Who We Share Your Personal Data With

We may share personal data with the following categories of third parties:

- Our Service Providers, (further described in the section in this Privacy Notice captioned “**How We Obtain Your Personal Data**”).
- Our affiliated entities, partners, prospective partners, and service providers in order to provide us and/or our affiliates and partners with information about the use of the Services and levels of engagement with the Services, to allow us to enter into new business relationships, and to allow us to market products or services on their behalf.
- Government agencies or regulations when permitted or required to do so by law; in response to a request from a law enforcement agency or authority or any regulatory authority; and/or to protect the integrity of the Services or our interests, rights, property, or safety, and/or that of our users and others.

3. YOUR RIGHTS REGARDING PERSONAL DATA

You have certain rights regarding the collection and processing of personal data. You may exercise these rights, to the extent they apply to you, by contacting us at the information provided at the end of this Privacy Notice, or by following instructions provided in this Privacy Notice or in communications sent to you.

a. Accessing, Modifying, Rectifying, and Correcting Collected Personal Data

We strive to maintain the accuracy of any personal data collected from you, and will try to respond promptly to update our records when you tell us the information in our records is not correct. However, we must rely upon you to ensure that the information you provide to us is complete, accurate, and up-to-date, and to inform us of any changes. Please review all of your information carefully before submitting it to us, and notify us as soon as possible of any updates or corrections.

Depending on the laws that apply to you, you may obtain from us certain personal data in our records. If you wish to access, review, or make any changes to personal data you have provided to us through the Services, please contact us at the information provided at the end of this Privacy Notice. We reserve the right to deny access as permitted or required by applicable law.

b. Your California Privacy Rights

California’s “Shine the Light” law, permits our users who are California residents to request and obtain from us a list of what personal data (if any) we disclosed to third parties for their own direct marketing purposes in the previous calendar year and the names and addresses of those third parties. Requests may be made only once per year per person, must be sent to the email address below, and are free of charge.

c. Your Nevada Privacy Rights

Nevada law permits our users who are Nevada consumers to request that their personal data not be sold (as defined under applicable Nevada law), even if their personal data is not currently being sold. Requests may be [sent to the email address below or by calling the toll-free number below, and are free of charge.

4. YOUR CHOICES

You have choices about certain information we collect about you, how we communicate with you, and how we process certain personal data. When you are asked to provide information, you may decline to do so; but if you choose not to provide information that is necessary to provide some of our Services, you may not be able to use those Services. In addition, it is possible to change your browser settings to block the automatic collection of certain information.

- a. **Communications Opt-Out.** You may opt out of receiving marketing or other communications from us at any time through a given communications channel (such as email or telephone) by following the opt-out link or other unsubscribe instructions provided in any email message received, by contacting us as provided at the end of this Privacy Notice, or by informing our customer service representatives of your desire to opt out. If you wish to opt out by sending us an email to the address provided below, please include "Opt-Out" in the email's subject line and include your name and the email address you used to sign up for communications in the body of the email. Note that if you do business with us in the future, you may not, subject to applicable law, opt out of certain automated notifications, such as order or subscription confirmations, based on business transactions (e.g., e-commerce).
- b. **Location Information.** If you want to limit or prevent our ability to receive location information from you, you can deny or remove the permission for certain Services to access location information or deactivate location services on your device. Please refer to your device manufacturer or operating system instructions for instructions on how to do this.
- c. **Cookies, Web Tracking, and Advertising.** You may opt out of certain tracking technologies through your device's or browser's cookie and/or advertising settings (including by blocking, deleting, or restricting cookies, or resetting your device's applicable advertising ID). Consult your device and/or browser documentation for more information about how to do this.

Please note that blocking, deleting, or restricting cookies may negatively affect the performance or certain functionality of the Services, and opting out of online behavioral advertising will not prevent the delivery of ads, but rather may result in more repetitive and/or less relevant advertisements.

To opt out of many online behavioral advertising mechanisms, including Facebook, Google, and others, you can use the Network Advertising Initiative's Consumer Opt-Out service and/or the Digital Advertising Alliance's Consumer Choice Tool.

If you would like to opt out of Google Analytics, and certain Google advertising functionality, you may do so using Google's opt-out tool.

5. PROTECTING PERSONAL DATA

We use reasonable and appropriate physical, technical, and organizational safeguards designed to promote the security of our systems and protect the confidentiality, integrity, availability, and resilience of personal data. Those safeguards include: (i) encryption of personal data at rest and in transit; (ii) use of a layered defense; (iii) role based access; (iv) monitoring the Services for anomalous activity; (v) taking steps to ensure personal data is backed up and

remains available in the event of a security incident; and (vi) periodic testing, assessment, and evaluation of the effectiveness of our safeguards.

However, no method of safeguarding information is completely secure. While we use measures designed to protect personal data, we cannot guarantee that our safeguards will be effective or sufficient. In addition, you should be aware that Internet data transmission is not always secure, and we cannot warrant that information you transmit utilizing the Services is or will be secure.

6. RETENTION OF PERSONAL DATA

We retain your personal data pursuant to our records retention policy, as well as to the extent we deem necessary to carry out the processing activities described above, including but not limited to compliance with applicable laws, regulations, rules and requests of relevant law enforcement and/or other governmental agencies, and to the extent we reasonably deem necessary to protect our and our partners' rights, property, or safety, and the rights, property, and safety of our users and other third parties.

7. OTHER IMPORTANT INFORMATION ABOUT PERSONAL DATA AND THE SERVICES.

- a. Collection of Personal Data from Children.** Children under 18 years of age are not permitted to use the Services without parental consent, and we do not knowingly collect information from children under the age of 18 without parental consent. By using the Services, you represent that you are 18 years of age or older. If you are a parent or guardian and you are aware that your child has provided us with personal data, please contact us. If we become aware that we have collected personal data from children without verification of parental consent, we will take steps to remove that information from our servers.
- a. Third-Party Websites and Services.** As a convenience, we may reference or provide links to third-party websites and services, including those of unaffiliated third parties, our affiliates, service providers, and third parties with which we do business. When you access these third-party services, you leave our Services, and we are not responsible for, and do not control, the content, security, or privacy practices employed by any third-party websites and services. You access these third-party services at your own risk. This Privacy Notice does not apply to any third-party services; please refer to the Privacy Notices or policies for such third-party services for information about how they collect, use, and process personal data.
- b. Business Transfer.** We may, in the future, sell or otherwise transfer some or all of our business, operations or assets to a third party, whether by merger, acquisition or otherwise. Personal data we obtain from or about you via the Services may be disclosed to any potential or actual third-party acquirers and may be among those assets transferred.
- c. Do Not Track.** We use analytics systems and providers and participate in ad networks that process personal data about your online activities over time and across third-party websites or online services, and these systems and providers may provide some of this information to us. We do not currently process or comply with any web browser's "do not track" signal or similar mechanisms.

You may exercise your choice regarding the use of cookies and other tracking technologies by visiting the analytics systems websites for customization tools or by modifying the settings of your web browsers across the devices you use.

- d. International Use.** Your personal data will be stored and processed in the United States. If you are using the Services from outside the United States, by your use of the Services you acknowledge that we will transfer your data to, and store your personal data in, the United States, which may have different data protection rules than in your country, and personal data may become

accessible as permitted by law in the United States, including to law enforcement and/or national security authorities in the United States.

8. MODIFICATIONS AND UPDATES TO THIS PRIVACY NOTICE

This Privacy Notice replaces all previous disclosures we may have provided to you about our information practices with respect to the Services. We reserve the right, at any time, to modify, alter, and/or update this Privacy Notice, and any such modifications, alterations, or updates will be effective upon our posting of the revised Privacy Notice. We will use reasonable efforts to notify you in the event material changes are made to our processing activities and/or this Privacy Notice, such as by posting a notice on the Services. Your continued use of the Services following our posting of any revised Privacy Notice will constitute your acknowledgement of the amended Privacy Notice.

9. APPLICABILITY OF THIS PRIVACY NOTICE

This Privacy Notice is subject to the website Terms of Service, the Membership Agreement and the Consumer Privacy Notice that govern your use of the Services. This Privacy Notice applies regardless of the means used to access or provide information through the Services.

This Privacy Notice does not apply to information from or about you collected by any third-party services, applications, or advertisements associated with, or websites linked from, the Services. The collection or receipt of your information by such third parties is subject to their own privacy policies, statements, and practices, and under no circumstances are we responsible or liable for any third party's compliance therewith.

10. ADDITIONAL INFORMATION AND ASSISTANCE

If you have any questions or concerns about this Privacy Notice and/or how we process personal data, please contact us at:

Veridian Credit Union
Attn: Compliance/Privacy
P.O. Box 6000
1827 Ansborough Ave
Waterloo, IA 50704
<https://www.veridiancu.org/contact-us/email>
800-235-3228

For more information about how users with disabilities can access this Privacy Notice in an alternative format, please view our [Accessibility Statement](#).