

AMERICA'S FIRST FEDERAL CREDIT UNION WEBSITE PRIVACY POLICY

America's First Federal Credit Union is committed to protecting your privacy and safeguarding your personal information. This Website Privacy Policy (this "Policy") explains how we collect, use, share, and protect your information when you visit our website, www.amfirst.org, use our mobile application, access online banking, or interact with our digital services. By using our services, you agree to the practices described in this Policy. This Policy complements our *Cookie Policy* and our *Privacy Policy*.

Key Points

- We collect personal, digital, and other information in order to provide financial services and enhance your membership experience.
- Your information is used to deliver services, personalize content, communicate with you, and ensure security.
- We share your information only as needed for services, legal compliance, or with your consent.
- You can control marketing communications, information sharing, and cookie preferences.
- We protect your data with industry-standard security measures and will notify you of breaches as required by law.

1. Information We Collect Through Our Website. We collect information to provide you with financial services, enhance your experience, and meet legal requirements. The types of information we collect include:

- **Personal Information:**
 - Identification details, such as your name, address, email address, phone number, Social Security number, and date of birth.
 - Account information, including account numbers, balances, transaction history, or login credentials for online banking or mobile application access.
 - Financial details, such as income, employment, or credit history, provided during applications for membership, loans, mortgages, or other services.
- **Digital Information:**
 - Device data, such as IP address, browser type, device ID, or operating system, collected when you use our website or our mobile application.
 - Website usage data, such as pages visited, links clicked, or time spent on our Services, often gathered via cookies or analytics tools.
 - Location data, such as general location based on IP address or precise geolocation (e.g., for fraud prevention), with your consent where required.
- **Other Information:**

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- Responses to surveys, feedback forms, or promotional campaigns.
- Communications with our member service team, including emails, calls, or chats.
- Aggregated or anonymized data that does not identify you, used for analytics or reporting.

2. How We Collect Information. We collect information in the following ways:

- **Directly from You:**

- When you apply for membership, open an account, or request services like loans, mortgages, or credit cards.
- When you use online banking, our mobile application software, or submit forms on our website (e.g., contact or loan pre-qualification forms).
- During interactions with our member service team via phone, email, chat, or in-branch visits.

- **Automatically Through Our Services:**

- Using cookies, pixel tags, and similar technologies to track your activity on our website or mobile application software
- Through server logs that record technical details like IP addresses, browser details, or access times.
- Using analytics tools (e.g., Google Analytics) to understand how members use Services.

- **From Third Parties:**

- Credit bureaus or consumer reporting agencies, in order to assess creditworthiness or verify identity, in compliance with the Fair Credit Reporting Act ("FRCA").
- Service providers, such as payment processors or fraud detection vendors, who support our operations.
- Partners in joint marketing programs or referrals, with your consent or as permitted by law.
- Public sources, such as government databases, for verification or compliance purposes, e.g., USA PATRIOT Act.

3. How We Use Your Information. We use your information to serve you, improve Services, and comply with our legal obligations. This includes:

- **Delivering Services:**

- Processing account openings, transactions, loan applications, or mortgage requests.

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- Providing online banking, mobile application features, or account alerts.
- Verifying your identity to ensure security and prevent fraud.
- **Improving, Analyzing, and Personalizing Our Website and Services:**
 - Analyzing usage data to improve our website, mobile application, or member services.
 - Personalizing content, such as tailored-product offers or financial tips, based on your account activity or preferences.
- **Communicating with You:**
 - Sending transactional notices, such as account statements, payment confirmations, or security alerts.
 - Sharing promotional materials/ advertisements, newsletters, or event invitations, subject to your communication preferences.
 - Responding to your inquiries, feedback, or service requests.
- **Ensuring Security and Legal compliance:**
 - Monitoring for and preventing fraudulent activity, unauthorized access, or cyber threats.
 - Complying with federal and state laws, NCUA regulations, and legal processes.
 - Maintaining records for regulatory or operational purposes.

4. How We Share Your Information. We share your information only as necessary to provide services, comply with laws, or with your permission, as permitted by law. We do not sell your personal information to third parties for their independent marketing or commercial purposes. We may disclose your information (including your personal information, when applicable):

- **Within America's First Federal Credit Union:**
 - With our internal teams or affiliated entities to manage your accounts or offer additional services (e.g., insurance or investment products), with an opt-out option for marketing by affiliates as required by GBLA.
- **With Service Providers:**
 - With trusted vendors who perform functions like payment processing, data storage, fraud prevention, or marketing support. These providers are bound by contracts to protect your information and use it only for our purposes.
- **For Joint Marketing:**
 - With non-affiliated financial partners to offer services, but only with your consent or as allowed by law. You may opt-out of such sharing.

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- **For Legal or Security Purposes:**

- To comply with laws, regulations, court orders, or regulatory inquiries.
- To protect the rights, property, or safety of our credit union, members, or the public.
- In connection with audits, investigations, or legal proceedings.

- **With Your Consent:**

- When you authorize us to share information, such as referring you to a third-party service provider.

- **Non-Personal Information:**

- We may share aggregated or de-identified data (e.g., website usage trends) for analytics, advertising, or research, ensuring it cannot be linked to you.

For additional information about how we share information, please review our *Annual Privacy Policy* on our website.

5. Cookies and Online Tracking. Our services use cookies (a program installed on your computer or mobile device when you visit a website) and tracking technologies in order to enable core features, such as secure logins, online banking, or form submissions; to remember your preferences, like language settings or account alerts; to track usage of Services; and, to deliver interest-based advertising. See our *Cookie Policy* for details.

6. Your Choices. Your options to control your information generally include:

- **Marketing Communications:**

- “Opt-out” of promotional emails by clicking “unsubscribe” in our emails or by contacting member services.
- “Opt-out” of text messages or phone calls by following instructions in the message or contacting member services.

- **Information Sharing:**

- You may limit certain sharing of your information for marketing purposes with non-affiliated third parties.

- **Cookies and Tracking:**

- Adjust cookie settings on your browser.

For additional information about controlling your information, please review our *Annual Privacy Policy* on our website.

7. How We Protect Your Information. We use industry-standard measures to protect your information, including:

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- **Encryption:** Secure Sockets Layer (SSL)/Transport Layer Security (TLS) for data transmission and storage.
- **Access Controls:** Limiting data access to authorized employees trained in privacy and security.
- **Fraud Monitoring:** Tools to detect and prevent unauthorized access or suspicious activity.
- **Physical Security:** Safeguards for our branches and data centers.
- **Compliance:** Adherence to industry security standards.

While we take measures to protect your personal information against security breaches and unauthorized access, we cannot guarantee that our safeguards will be effective all of the time against all security threats. If a security-incident occurs, we will notify affected members and regulators as required by law.

8. Third-Party Websites and Services. Services may link to third-party websites, applications, or services (e.g., payment processors or credit card partners). We are not responsible for their privacy practices. Please review their policies before sharing information.

9. Children's Privacy. Services are not intended for individuals under 13 years of age. We do not knowingly collect personal information from children aged 13 years or less. If we discover such information, we will delete it. Parents or guardians may report inadvertent collection by contacting us.

10. Updates to This Policy. We may update this policy to reflect changes in our practices, laws, or Services. The updated policy will be posted on our website with a new "Effective Date." Significant changes will be communicated via email, our website, or online banking notifications.

11. Legal compliance. This Policy complies with federal and state law including GLBA, Children's Online Privacy Protection Act, Alabama Data Breach Notification Act, NCUA regulations.

12. Contact Us. For questions or concerns about anything covered in this Policy, you may contact us at:

- **Email:** memberservices@amfirst.org
- **Phone:** (205) 320-4000 or toll-free at 1-800-633-8431
- **Mail:** America's First Federal Credit Union, Attention: Member Services, P.O. Box 11349, Birmingham, AL 35202.
- **In Person:** Visit any of our branch locations.