

First Watch FCU Text Services Privacy Policy

The First Watch Federal Credit Union (FWFCU) Text Services application and the associated FWFCU Text Services website available at www.myfwcu.org/member-services/text-services are owned and operated by FWFCU Text Services ("us" "we" or "our"). This FWFCU Text Services privacy policy (the "Privacy Policy") is intended to inform you of our policies and practices regarding the collection, use and disclosure of any information you submit to us through FWFCU Text Services. This includes "Personal Information," which is information about you that is personally identifiable such as your name, e-mail address, user ID number, and other non-public information that is associated with the foregoing, as well as "Anonymous Information," which is information that is not associated with or linked to your Personal Information and does not permit the identification of individual persons.

User Consent. By accessing or otherwise using FWFCU Text Services, you agree to the terms and conditions of this Privacy Policy and the associated Terms of Service (set forth on www.myfwcu.org/member-services/useful-forms/) you expressly consent to the processing of your Personal Information and Anonymous Information according to this Privacy Policy.

Your Personal Information may be processed by us in the country where it was collected as well as other countries (including the United States) where laws regarding processing of Personal Information may be less stringent than the laws in your country.

Regarding Children and Minors under 18. Children under the age of 13 are not permitted to use FWFCU Text Services and we do not intentionally collect or maintain Personal Information from those who are under 13 years old. Protecting the privacy of children is very important to us. Thus, if we obtain actual knowledge that a user is under 13, we will take steps to remove that user's Personal Information from our databases. We have taken steps to limit participation for all youth accounts. We recommend that children between the ages of 13 and 18 obtain their parent's permission before submitting information over the internet/text and a parent should contact us prior to enrollment. By using FWFCU Text Services, you are representing that you are at least 18 years old, or that you are at least 13 years old and have your parents' permission to use FWFCU Text Services.

Collection and Use of Information

Personal Information. In general, we collect Personal Information that you submit to us voluntarily through FWFCU Text Services. We also collect information that you submit in the process of creating or editing your account and user profile on FWFCU Text Services. For example, our registration and login process requires you to provide us with your name, valid email address and password of your choice. When you personalize your profile and use the features of FWFCU Text Services, we will collect any information you voluntarily provide, and we may also request optional information to support your use of FWFCU Text Services, such as your year of birth, gender and other demographic information. We collect information in the form of the content that you submit during your use of FWFCU Text Services, such as photos, comments, ratings and other information you choose to submit. If you choose to sign up to receive information about products or services that may be of interest to you, we will collect your email address and all related information. Additionally, we collect any information that you voluntarily enter, including Personal Information, into any postings, comments, or forums within the FWFCU Text Services community.

E-mail and E-mail Addresses. If you send an e-mail to us, or fill out our "Feedback" form through FWFCU Text Services, we will collect your e-mail address and the full content of your e-mail, including attached files, and other information you provide. We may use this e-mail address to contact you, for things such as notifications about your account, promotional offerings, branch closures, and other related information. You may indicate your preference to stop receiving further promotional communications as further detailed below.

Information Collected Via Technology. As you use FWFCU Text Services, certain information may also be passively collected and stored on our or our service providers' server logs, including your Internet protocol address, browser type, and operating system. We also use Cookies and navigational data like Uniform Resource Locators (URL) to gather information regarding the date and time of your visit and the solutions and information for which you searched and viewed, or on which of the advertisements displayed on FWFCU Text Services you clicked. This type of information is collected to make FWFCU Text Services and solutions more useful to you and to tailor the experience with FWFCU Text Services to meet your special interests and needs.

An "Internet protocol address" or "IP Address" is a number that is automatically assigned to your computer when you use the Internet. In some cases your IP Address stays the same from browser session to browser session; but if you use a consumer internet access provider, your IP Address probably varies from session to session. For example, we, or our service providers, may track your IP Address when you access FWFCU Text Services to assist with ad targeting.

"Cookies" are small pieces of information that a website sends to your computer's hard drive while you are viewing a website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience with FWFCU Text Services. Persistent Cookies can be removed by following your Internet browser help file directions. In order to use our services offered through FWFCU Text Services, your web browser must accept Cookies. If you choose to disable Cookies, some aspects of FWFCU Text Services may not work properly, and you will not be able to receive our services.

Use and Disclosure of Information. Except as otherwise stated in this Privacy Policy, we do not generally sell, trade, rent, or share the Personal Information that we collect with third parties, unless you ask or authorize us to do so.

In general, Personal Information you submit to us is used by us to provide you access to FWFCU Text Services, to improve FWFCU Text Services, to better tailor the features, performance, and support of FWFCU Text Services and to offer you additional information, opportunities, promotions and functionality from us or our partners at your request.

We may provide your Personal Information to third-party service providers who work on behalf of or with us to provide some of the services and features of FWFCU Text Services and to help us communicate with you. Examples of such services include sending email, analyzing data, providing marketing assistance, processing payments (including credit card payments), and providing customer service. We require our third-party service providers to promise not to use such information except as necessary to provide the relevant services to us. We may share some or all of your Personal Information with our third-party partners only for the purpose of providing FWFCU Text Services to you.

This Privacy Policy does not cover the use of your personally identifiable information by such third-parties. We do not maintain responsibility for the manner in which third party service providers use or further disclose Personal Information collected from you in accordance with this Privacy Policy, after we have disclosed such information to those third parties. If you do not want us to use or disclose Personal Information collected about you in the manners identified in this Privacy Policy, you may not use FWFCU Text Services.

Although we currently do not have a parent company, any subsidiaries, joint ventures, or other companies under a common control, we may in the future, and we may share some or all of your Personal Information with these companies, in which case we will require them to honor this Privacy Policy.

In the event we go through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your Personal Information may be among the assets transferred. You acknowledge that such transfers may occur and are permitted by this Privacy Policy, and that any acquirer of ours or that acquirer's assets may continue to process your Personal Information as set forth in this Privacy Policy.

We may disclose your Personal Information if we believe in good faith that such disclosure is necessary to (a) comply with relevant laws or to respond to subpoenas or warrants served on us; or (b) to protect and defend our rights or property, you, or third parties. You hereby consent to us sharing your Personal Information under the circumstances described herein.

Your Choices Regarding Your Personal Information We offer you choices regarding the collection, use, and sharing of your Personal Information. When you receive promotional communications from us, you may indicate a preference to stop receiving further promotional communications from us and you will have the opportunity to "opt-out" by replying "STOP" to the SMS message you receive or by contacting us directly (please see contact information below).

Despite your indicated email preferences, we may send you administrative emails regarding FWFCU Text Services, including, for example, administrative confirmations, and notices of updates to our Privacy Policy if we choose to provide such notices to you in this manner.

You may request deletion of your Personal Information by contacting us at memberservices@myfwcu.org, but please note that we may be required (by law or otherwise) to keep this information and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request, only after we have fulfilled such requirements). When we delete Personal Information, it will be deleted from the active database, but may remain in our archives.

Feedback. If you provide feedback to us, we may use and disclose such feedback for any purpose, provided we do not associate such feedback with your Personal Information. We will collect any information contained in such feedback and will treat the Personal Information in it in accordance with this Privacy Policy. You agree that any such comments and any email we receive becomes our property. We may use feedback for marketing purposes or to add to or modify our services without paying any royalties or other compensation to you.

Security. We are committed to protecting the security of your Personal Information. We use a variety of industry-standard security technologies and procedures to help protect your Personal Information from unauthorized access, use, or disclosure. Even though we have

taken significant steps to protect your Personal Information, no company, including us, can fully eliminate security risks associated with Personal Information.

Contact and Revisions. If you have questions or concerns about our Privacy Policy, please contact us at: memberservices@myfwcu.org. This Privacy Policy is subject to occasional revision at our discretion, and if we make any substantial changes in the way we use your Personal Information, we will post an alert on this page. If you object to any such changes, you must cease using FWFCU Text Services. Continued use of FWFCU Text Services following notice of any such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

7/2022 9600-30.1