

PRIVACY POLICY

Last updated: March 2024

CHROME Federal Credit Union is committed to safeguarding our members personal information by practicing responsible information sharing and utilizing stringent security measures. Regardless of whether you interact with our website (<https://www.chromefcu.org/>), online banking portal, the CHROME FCU mobile application, or the CHROME CardConnect mobile application (collectively, the "Platform"), this Privacy Policy outlines how we treat your personal information, including the type of information we collect, how it is used, in what types of situations we may share certain information with other parties, and what your rights are with respect to your information. The Privacy Policy is furnished to our members annually. It can be viewed at any time by visiting CHROME Federal Credit Union Privacy Policy or within Settings of the mobile apps.

FACTS	WHAT DOES CHROME FEDERAL CREDIT UNION DO WITH YOUR PERSONAL INFORMATION?	
What?	The types of personal information we collect, use, and share depend on the product or service you have with us. This information can include:	
	Information You Provide	<ul style="list-style-type: none"> ❖ Name, postal address, email address, telephone number ❖ Account username and password ❖ Social Security number ❖ Employment and income information
	Information About You	<ul style="list-style-type: none"> ❖ Account number(s) and account information ❖ Credit and payment history
	Information Collected Automatically (such as through cookies and web beacons)	<ul style="list-style-type: none"> ❖ Device information used to access the Platform, including device identifier, operating system, and browser type ❖ IP Address and general location information ❖ Usage information, including pages or screens accessed, length of access, and navigation paths between pages or screens
When?	We may collect or use personal information: <ul style="list-style-type: none"> ❖ When you provide it to us directly, such as (i) through the application or account creation process, (ii) performing transactions such as depositing money, paying bills, or using your debit or credit card, (iii) submitting questions or contacting us through the Platform, and (iv) other communications initiated by you ❖ Automatically as you navigate the Platform, including information collected through cookies, web beacons and other tracking technologies ❖ From third parties, such as our affiliates, non-affiliates, and joint marketing partners (see end for Definitions) 	
How?	We use the personal information we collect for the following purposes: <ul style="list-style-type: none"> ❖ To provide financial services to you, including administering and maintaining your account(s) ❖ To respond to your requests for information or questions ❖ To fulfill any contracts or agreements with you ❖ To remember you or your device(s) on the Platform ❖ To correspond with you about your account, as well as information, products, services that may be of interest to you ❖ To fulfill our legal obligations to the courts, credit bureaus, and regulatory authorities ❖ To analyze our Platform usage and traffic ❖ For marketing purposes ❖ To develop and improve our products and services 	
Sharing	All financial companies need to share members' personal information to run their everyday business – to process transactions, maintain member accounts, and report to credit bureaus. In the section below, we list the reasons financial companies can share their members' personal information, the reason CHROME Federal Credit Union chooses to share, and whether you can limit this sharing.	
Reasons we can share:		
	Does CHROME Federal Credit Union share?	Can you limit sharing?
For our everyday business purposes – such as with service providers to process your transactions, maintain your account(s), respond to court orders and legal investigations, and report to credit bureaus	Yes	No
For our marketing purposes – to offer our own products and services to you	Yes	Yes
For joint marketing with other financial companies	Yes	Yes
For our affiliates' everyday business purposes – information about your transactions, experiences, and creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For non-affiliates to market to you	Yes	Yes

<h2>Third Parties</h2>	<p>Social Media</p>	<ul style="list-style-type: none"> ❖ Profiles - CHROME Federal Credit Union maintains profiles and other information on many popular social networking sites, including but not limited to Facebook, X (formerly Twitter), LinkedIn, Pinterest, YouTube, Google+ & Instagram. Information posted on these sites is governed under the privacy policy and terms of the property. You should be aware that any information you provide on these sites may be read, collected, and used by others who access them. CHROME Federal Credit Union monitors activity on these pages and is provided with reporting that analyzes how user interact with each service, including reviews, comments, mentions. ❖ Widgets - The Platform may also include Social Media Features, such as the Facebook Like button and Widgets, such as the Share this button or interactive mini-programs that run on our site. These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Site. Your interactions with these Features are governed by the privacy policy of the company providing it.
	<p>Links to Third Party Sites</p>	<p>Our website may include links to other websites whose privacy practices may differ from those of CHROME Federal Credit Union. If you submit personal information to any of those third-party sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.</p>
	<p>Third Party Cookies</p>	<ul style="list-style-type: none"> ❖ Remarketing - The Platform uses Google Ads and Facebook remarketing services to advertise on third party websites to previous visitors to our site. It could mean that we advertise to previous visitors who haven't completed a task on our site. This could be in the form of an advertisement on the Google search results page, a site in the Google Display Network, or somewhere on Facebook. Third-party vendors, including Google and Facebook, use cookies to serve ads based on someone's past visits to the CHROME Federal Credit Union website. Any data collected will be used in accordance with our own privacy policy, as well as Google & Facebook privacy policies. ❖ Social media - Social media platforms where we maintain an account and/or widget integration may also place cookies on your device when interacting with that social media platform, for providing ads based on your interactions. Any data collected by these third party cookies will be used and governed according to the privacy policy of the third party placing the cookie.
	<p>Third Party Personal Information</p>	<p>You may use the Platform to provide the personal information of others (name and email address) for referral purposes to us. Likewise, even if you are not a member, your personal information (name and email address) may be provided to us by a member using the Platform for similar referral reasons. Regardless of how it is provided, this information is only used for the sole purpose of referring those people to us for promoting our products and services directly to them. Any contact we have with them as a result will provide a way to opt-out of future communications through an "Unsubscribe" link and will not require the creation of an account or any use of our products or services.</p>
<h2>Your Choices</h2>	<p>To limit sharing of your personal information, you can:</p> <ul style="list-style-type: none"> ❖ Set your browser to refuse all or some cookies (though some parts of the Platform may not function properly if you disable or refuse cookies). Third party cookies can be limited or refused this way. ❖ Opt-out of third party cookies by completing the fillable form below, by adjusting the settings in the Ad Preferences section of your account (for social media platforms), by visiting myadcenter.google.com/home (for Google), and/or by visiting the Network Advertising Initiative or the Digital Advertising Alliance (for advertising in general). ❖ Opt-out of receiving promotional offers by selecting the unsubscribe link in the email or checking the box in the relevant form (though we may still contact you for non-advertising purposes, such as communications relating to your account). ❖ Contact us at: <p>Email: compliance@chromefcu.org Call: 724-228-2030 or 855-712-4766 (toll free) Write: P.O. Box 658, Canonsburg, Pennsylvania 15317, USA Visit: www.chromefcu.org</p> <p>Please note: If you are a new member, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our member, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p>	
<h2>Security</h2>	<p>We use appropriate security measures to protect your personal information from accidental loss and unauthorized access, use, alteration, and disclosure, including the following:</p> <ul style="list-style-type: none"> ❖ End-to-end encryption (in motion and at rest) ❖ HTTPS encryption using the most current TLS protocol. ❖ All personal information is stored on secure servers behind firewalls, using systems and processes that are ISO 27001 certified. ❖ Access is limited to those employees, agents, and service providers who have a business need to know. ❖ Account login information is protected through an enterprise password-encryption management tool that is SOC2 compliant. ❖ Multifactor authentication is additionally required for any access to any account. <p>Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If we learn of any breach or unauthorized access that may impact your personal information under our control, we will notify you and the appropriate authorities, as required by applicable law.</p>	

Retention & Deletion	All personal information is stored in Google's cloud-hosted servers for financial institutions located in the United States. Your information may therefore be transferred to another state, province, or country from your location. Your consent to this Privacy Policy and use of any aspect of the Platform represents your consent to this transfer. We retain your personal information for as long as you have an active account with us, after which it may be retained for up to 4 years for our own internal Platform testing purposes, or longer as may be required by law or the National Credit Union Association ("NCUA"). We follow the NCUA's guidelines for purge schedules and policies.
Children	CHROME Federal Credit Union's website and mobile applications do not knowingly collect information from children. Should a child whom we know to be under the age of 13 send personal information to us, we will only use that information to respond directly to that child, seek parental consent or provide parental notice.
Updates	We may update this Privacy Policy from time to time to reflect changes to our information practices. If we make any material changes, we will notify you by email (sent to the email address specified in your account) or by means of a notice on the website prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

Additional FAQ

Why can't I limit all sharing?	Federal law gives you the right to limit only: <ul style="list-style-type: none"> ❖ Sharing for affiliates' everyday business purposes – information about your creditworthiness; ❖ Affiliates from using your information to market to you; ❖ Sharing for non-affiliates to market to you. State laws and individual companies may give you additional rights to limit sharing with respect to targeted advertising, contextual advertising, and the use of sensitive personal information.
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account.
Why can't you delete all my information if I request it?	Privacy laws and laws governing financial institutions permit us to retain certain information even if it is requested to be deleted, such as if it is needed for any of the following reasons: <ul style="list-style-type: none"> ❖ To complete a request or transaction you initiate, or to fulfill a contract with you ❖ If the personal information is otherwise publicly available from government records ❖ If we cannot verify your identity ❖ For certain business security practices ❖ For certain internal uses compatible with reasonable expectations or the context in which the information was provided ❖ To comply with our reporting obligations to regulators, credit reporting agencies, law enforcement and courts, and other legal obligations ❖ To exercise legal claims or rights, or defend legal claims

Definitions

Affiliates:	Companies related by common ownership or control. - <i>CHROME Federal Credit Union has no affiliates.</i>
Non affiliates:	Companies not related by common ownership or control. - <i>Non affiliates we share with can include TruStage.</i>
Joint marketing:	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. Our joint marketing partners include: <i>CHROME Federal Credit Union jointly markets with TruStage.</i>

By providing telephone number(s) to us at any time, you authorize CHROME Federal Credit Union and its designees to contact you regarding your personal account(s) or business accounts for which you are an authorized signer at such numbers using any means, including but not limited to placing calls using an automated dialing system to cell, VoIP or other wireless phone number, or by sending prerecorded messages or text messages, even if charges may be incurred for the calls or text messages; and you consent that any phone call with us may be monitored or recorded by us.

Questions?	Call 724-228-2030 or 855-712-4766, email compliance@chromefcu.org or visit www.chromefcu.org .
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NOTICE

CHROME Federal Credit Union's website (<https://www.chromefcu.org/>), online banking portal, and CHROME CardConnect mobile app are developed, operated and maintained by Jack Henry & Associates, Inc. ("Jack Henry"). As such, Jack Henry has access to the personal information collected and used by the Platform. This Privacy Policy therefore includes and incorporates Jack Henry's Privacy Policy: <https://www.jackhenry.com/privacy-policy>. We encourage you to review their policy carefully.