

MOBILE APP PRIVACY POLICY

Last updated March 19, 2021

[Horizon Credit Union] (“we” or “us” or “our”) respects the privacy of our users (“user” or “you”). This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit/use our mobile application, Horizon CU Mobile Banking (the “Application”). Please read this Privacy Policy carefully. IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY, PLEASE DO NOT ACCESS THE APPLICATION.

We reserve the right to make changes to this Privacy Policy at any time and for any reason. We will alert you about any changes by updating the “Last updated” date of this Privacy Policy. You are encouraged to periodically review this Privacy Policy to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Policy by your continued use of the Application after the date such revised Privacy Policy is posted. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand how we handle **user privacy**.

This Privacy Policy does not apply to the third-party online/mobile store from which you install the Application or make payments, which may also collect and use data about you. We are not responsible for any of the data collected by any such third party.

Background Operations: The Horizon CU Mobile Banking application continue performing operations in the background even when the Application is not in active use . But the app will not request your location in the background operations.

COLLECTION OF YOUR INFORMATION

We may collect information about you in a variety of ways. The information we may collect via the Application depends on the content and materials you use, and includes:

I. Personal Data

Demographic and other personally identifiable information (such as your name and email address) that you voluntarily give to us when choosing to participate in various activities related to the Application, such as chat, sending feedback, and responding to surveys.

II. Derivative Data

Information our (or our partnered vendors) servers automatically collect when you access the Application, such as your native actions that are integral to the Application, web browser information, network connectivity information (including IP address), as well as other interactions within the Application via server log files.

III. Financial Data

Financial information, including transactions, transfers, scheduled payments, saved payment information, and account historic data is saved in the Application.

IV. Data from Social Networks

User information from social networking sites, such as [Apple's Game Center, Facebook, Google+ Instagram, Pinterest, Twitter], including your name, your social network username, location, gender, birth date, email address, profile picture, and public data for contacts, if you connect your account to such social networks. This information may also include the contact information of anyone you invite to use and/or join the Application.

V. Location Data

We may request access or permission to and track location-based information from your mobile device, either continuously or while you are using the Application, to provide location-based services. These services include the ability to limit where a transaction can be performed. Geo-location can also be used to offer you products and services that are relevant to you. If you wish to change our access or permissions, you may do so in your device's settings. Location data is collected to provide location based messages, offers and interactions and will not be shared with third parties except as required by law.

VI. Mobile Device Access

We may request access or permission to certain features from your mobile device, including your mobile device's [Bluetooth, calendar, camera, contacts, microphone, reminders, sensors, SMS messages, social media accounts, storage,] and other features. If you wish to change our access or permissions, you may do so in your device's settings.

VII. Mobile Device Data

Device information such as your mobile device ID number, model, and manufacturer, version of your operating system, phone number, country, location, and any other data you choose to provide.

VIII. Push Notifications

We may request to send you push notifications regarding your account or the Application. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.

IX. Data From Contests, Giveaways, and Surveys

Personal and other information you may provide when entering contests or giveaways and/or responding to surveys.

USE OF YOUR INFORMATION

Having accurate information about you permits us to provide you with a smooth, efficient, and customized experience. Specifically, we may use information collected about you via the Application to:

1. Administer sweepstakes, promotions, and contests.
2. Assist law enforcement and respond to subpoena.
3. Compile anonymous statistical data and analysis for use internally or with partnered third parties.
4. Create and manage your account.
5. Deliver targeted advertising, coupons, newsletters, and other information regarding promotions

and the Application to you.

6. Email you regarding your account or order.
7. Fulfill and manage purchases, orders, payments, and other transactions related to the Application.
8. Generate a personal profile about you to make future visits to the Application more personalized.
9. Increase the efficiency and operation of the Application.
10. Monitor and analyze usage and trends to improve your experience with the Application.
11. Notify you of updates to the Application.
12. Offer new products, services, mobile applications, and/or recommendations to you.
13. Perform other business activities as needed.
14. Prevent fraudulent transactions, monitor against theft, and protect against criminal activity.
15. Process payments and refunds.
16. Request feedback and contact you about your use of the Application.
17. Resolve disputes and troubleshoot problems.
18. Respond to product and customer service requests.

DISCLOSURE OF YOUR INFORMATION

We may share information we have collected about you in certain situations. Your information may be disclosed as follows:

X. By Law or to Protect Rights

If we believe the release of information about you is necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property, and safety of others, we may share your information as permitted or required by any applicable law, rule, or regulation. This includes exchanging information with other entities for fraud protection and credit risk reduction.

XI. Third-Party Service Providers

We may share your information with third parties that perform services for us or on our behalf, including payment processing, data analysis, email delivery, hosting services, customer service, and marketing assistance.

XII. Third-Party Advertisers

We may use third-party advertising companies to serve ads when you visit the Application. These companies may use information about your visits to the Application and other websites that are contained in web cookies in order to provide advertisements about goods and services of interest to you.

XIII. Affiliates

We do not share your information with affiliates.

XIV. Business Partners

We may share your information with our business partners to offer you certain products, services or promotions.

XV. Other Third Parties

We may share your information with advertisers and investors for the purpose of conducting general business analysis. We may also share your information with such third parties for marketing purposes, as permitted by law.

XVI. Sale or Bankruptcy

If we reorganize or sell all or a portion of our assets, undergo a merger, or are acquired by another entity, we may transfer your information to the successor entity. If we go out of business or enter bankruptcy, your information would be an asset transferred or acquired by a third party. You acknowledge that such transfers may occur and that the transferee may decline honor commitments we made in this Privacy Policy.

We are not responsible for the actions of third parties with whom you share personal or sensitive data, and we have no authority to manage or control third-party solicitations. If you no longer wish to receive correspondence, emails or other communications from third parties, you are responsible for contacting the third party directly.

TRACKING TECHNOLOGIES

XVII. Cookies and Web Beacons

We may use cookies, web beacons, tracking pixels, and other tracking technologies on the Application to help customize the Application and improve your experience. When you access the Application, your personal information is not collected through the use of tracking technology. Most browsers are set to accept cookies by default. You can remove or reject cookies, but be aware that such action could affect the availability and functionality of the Application. You may not decline web beacons. However, they can be rendered ineffective by declining all cookies or by modifying your web browser's settings to notify you each time a cookie is tendered, permitting you to accept or decline cookies on an individual basis.

XVIII. Internet-Based Advertising

Additionally, we may use third-party software to serve ads on the Application, implement email marketing campaigns, and manage other interactive marketing initiatives. This third-party software may use cookies or similar tracking technology to help manage and optimize your online experience with us. For more information about opting-out of interest-based ads, visit the [Network Advertising Initiative Opt-Out Tool](#) or [Digital Advertising Alliance Opt-Out Tool](#).

XIX. Website Analytics

We may also partner with selected third-party vendors to allow tracking technologies and remarketing services on the Application through the use of first party cookies and third-party cookies, to, among other things, analyze and track users' use of the Application, determine the popularity of certain content, and better understand online activity. By accessing the Application, you consent to the collection and use of

your information by these third-party vendors. All vendors are responsible for adhering to his privacy policy for any services they are performing within the Application. We do not transfer personal information to these third-party vendors. However, if you do not want any information to be collected and used by tracking technologies, you can install and/or update your settings on your device or by installing opt-out plugins. You should be aware that getting a new computer, installing a new browser, upgrading an existing browser, or erasing or otherwise altering your browser's cookies files may also clear certain opt-out cookies, plug-ins, or settings.

THIRD-PARTY WEBSITES

The Application may contain links to third-party websites and applications of interest, including advertisements and external services, that are not affiliated with us. Once you have used these links to leave the Application, any information you provide to these third parties is not covered by this Privacy Policy, and we cannot guarantee the safety and privacy of your information. Before visiting and providing any information to any third-party websites, you should inform yourself of the privacy policies and practices (if any) of the third party responsible for that website, and should take those steps necessary to, in your discretion, protect the privacy of your information. We are not responsible for the content or privacy and security practices and policies of any third parties, including other sites, services or applications that may be linked to or from the Application.

SECURITY OF YOUR INFORMATION

We use administrative, technical, and physical security measures to help protect your personal information. While we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse. Any information disclosed online is vulnerable to interception and misuse by unauthorized parties. Therefore, we cannot guarantee complete security if you provide personal information.

POLICY FOR CHILDREN

We do not knowingly solicit information from or market to children under the age of 13. If you become aware of any data we have collected from children under age 13, please contact us using the contact information provided below.

CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Policy.

OPTIONS REGARDING YOUR INFORMATION

XX. Account Information

You may at any time review or change the information in your account or terminate your Application account by:

- Logging into your account settings and updating your account
- Contacting us using the contact information provided below

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.

XXI. Emails and Communications

If you no longer wish to receive correspondence, emails, or other communications from us, you may opt-out by:

- Logging into your account settings and updating your preferences.
- Contacting us using the contact information provided below

If you no longer wish to receive correspondence, emails, or other communications from third parties where you have enrolled to receive correspondence, you are responsible for contacting the third party directly.

CALIFORNIA PRIVACY RIGHTS

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the Application, you have the right to request removal of unwanted data that you publicly post on the Application. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Application, but please be aware that the data may not be completely or comprehensively removed from our systems.

CONTACT US

If you have questions or comments about this Privacy Policy, please

contact us at:

Horizon Credit Union

13224 E Mansfield

Ave. Spokane Valley,

WA 99216

800.852.5316

marketing@hzcu.org