

## **ICUL Privacy Policy for [www.icul.com](http://www.icul.com) and ICUL mobile app**

At the Illinois Credit Union League (referred to as “ICUL,” “us” or “we”), we recognize that your privacy is important. This Policy discloses the privacy practices for the [www.icul.com](http://www.icul.com) website and ICUL mobile app (collectively, the “Site”), as well as related products and services we may offer to you (collectively, the “Services”). This Policy also covers how personal and other information that we receive or collect about you is treated. Please read the information below to learn the following regarding your use of this Site.

You acknowledge that this Privacy Policy is designed to be read in connection with any applicable terms and conditions, and that by accessing or using our Site, you agree to be bound by the applicable terms and conditions, as well as this Policy.

We reserve the right to change this Privacy Policy from time to time. We will notify you about significant changes in the way we treat personal information by placing a prominent notice on our site, and by updating any privacy information on this page. Your continued use of the Site and/or Services available through this Site after such modifications will constitute your: (a) acknowledgment of the modified Policy; and (b) your agreement to abide and be bound by that Policy. If you have any questions about this Policy, please feel free to contact us. Our contact information is provided at the end of this Policy.

**IMPORTANT: BY USING THE SITE AND/OR OFFERINGS AVAILABLE ON THIS SITE, YOU GIVE YOUR CONSENT THAT ALL PERSONAL DATA THAT YOU SUBMIT MAY BE PROCESSED BY US IN THE MANNER AND FOR THE PURPOSES DESCRIBED BELOW. IF YOU DO NOT AGREE TO THESE TERMS AND CONDITIONS, DO NOT USE THE SITE.**

### **1. Types of Information We Collect**

In order to better provide you with information and services, we collect two types of information about our users: Personally Identifiable Information (“PII”) and Aggregate Information. PII refers to information that lets us know the specifics of who you are. When you engage in certain activities on this Site, such as registering for an event or sending us feedback, we may ask you to provide certain information about yourself.

Examples of PII may include your first and last name, email address, mailing address (including zip code), telephone numbers, card numbers, and other identifying information.

Aggregate Information is information about Site users that does not contain PII.

### **2. How We Collect and Use Information**

We do not collect any PII about you unless you voluntarily provide it to us. However, you may be required to provide certain PII to us when you elect to use certain products or services available on the Site. These may include: (a) registering for an event on our Site; (b) sending us an email message; (c) submitting a form or transmitting other information; or (d) submitting your credit card or other payment information when ordering and purchasing products and services on our Site. When processing certain information, such as payment information with affiliated financial institutions or payment processors, we encrypt the transaction, using Secure Socket Layer (SSL) encryption technology, in order to prevent your PII from being stolen or intercepted. We will primarily use your PII to provide product or service offerings to you. We will also use certain forms of PII to enhance the operation of our Site, improve our internal marketing and promotional efforts, statistically analyze Site use, improve our product and service offerings, and customize our Site’s content, layout, and services. We may use PII to deliver information to you and to

contact you regarding administrative notices. Finally, we may use your PII to resolve disputes, troubleshoot problems and enforce our agreements with you, including this Privacy Policy.

### **3. Cookies and Web Beacons**

In order to help enhance the performance and functionality of the Site, we utilize session, persistent, and third-party “cookies” that store a small piece of data on a user’s computer and collect certain information about the user’s visit to our Site. We also use cookies to understand users’ browsing and buying activities so that we can measure the success of online advertising campaigns we run on the Site. Our Site also uses web beacons (either directly or from our partners), along with cookies, to determine if a user has visited a particular website. These beacons aid in providing more relevant advertising to the user, as well as measuring the success of an advertising campaign, but provide no personally identifiable information.

Cookies are small text files that web servers typically send to users’ computers when they visit a website. Cookies are stored as text files on users’ hard drives, and can be accessed by web servers when the user visits a website or views an advertisement. A session cookie is a cookie that stores information as a user is using the Site but is deleted once the browser session is finished. A persistent cookie is a cookie that stores information as a user utilizes the Site and stores and uses that information in connection with future visits of the user to the Site. Third-party cookies and/or web beacons are cookies or web beacons provided by our technology and/or advertising partners. Any third-party cookie or web beacon that we authorize for use on the Site only collects that information described below for the same stated purposes as if we were directly collecting the information. For a third-party cookie or web beacon, the third party will have access to the collected information in order to provide us with information or services to enhance the performance and functionality of the Site.

The cookies and web beacons we use collect non-personally identifiable information about users of the Site, including: browser used to access the site, date and time, the URL of the page being loaded, users who have visited a particular website(s), any previously assigned cookie identification (a unique identifier assigned to a user to identify repeat visitors), browser window size, the geographic location of the user, and the device and operating system used to access the Site. The information we collect from these cookies and web beacons is used to determine information about a user’s visit to our Site, including the number of visits, average time spent, pages viewed, navigation history through the website, and other statistics. This information is used to enhance the user’s experience while visiting our Site and to improve the performance of our Site by, among other things, allowing us to monitor Site performance, making the Site easier to use, measuring the effectiveness of promotional placements, and tailoring the Site (including the ads and offers a user receives) to better match a user’s interests and preferences.

Users who prefer not to accept cookies can set their Internet browser to notify them when they receive a cookie or to prevent cookies from being placed on their hard drive. If you consent to our collection of cookies and you subsequently wish to withdraw your consent, you will need to manage the settings on your web browser to delete all cookies and disallow further acceptance of cookies. Please note that disabling cookies on your browser will prevent us from tracking your activities in relations to our Site, however, it may also disable some of the functions and features of the Site and the Site may not work properly.

If you would like to determine your consent status, please contact us. Our contact information is provided at the end of this Policy.

By continuing to use our Site, you are agreeing to our placing cookies and/or web beacons on your computer in order to analyze the way you use our Site. Please read this cookie policy carefully for more

details about the information we collect when you use the Site. If you do not wish to accept cookies or web beacons in connection with your use of this Site, please discontinue use of the Site.

#### **4. Release of Information**

We will not sell, trade, or rent your PII to others. We do provide some of our product and service offerings through contractual arrangements made with affiliates, service providers, partners, and other third parties (“Service Partners”). We and our Service Partners may need to use some PII in order to perform tasks between our respective sites, or to deliver products or services to you. For example, we must release your credit card information to the card-issuing financial institution to confirm payment for products and services purchased on this Site and provide order information to third parties that help us provide products and services. We do not allow Service Partners to resell or use your PII for their own purposes.

We will encourage our Service Partners to adopt and promote strong privacy policies. However, the use of your PII by our Service Partners is governed by the respective privacy policies of those providers, and is not subject to our control. Except as otherwise discussed in this Privacy Policy, this document only addresses the use and disclosure of information we collect from you. We are not responsible for the policies or practices of third parties.

Occasionally we may be required by law enforcement or judicial authorities to provide PII to the appropriate governmental authorities. In such cases, we will disclose PII upon receipt of a court order, subpoena, or to cooperate with a law enforcement investigation. We fully cooperate with law enforcement agencies in identifying those who use our services for illegal activities. We reserve the right to report to law enforcement agencies any activities that we in good faith believe to be unlawful.

#### **5. Updating and Correcting Information**

We believe you should have the ability to access and edit the PII that you have provided to us. You may change any of your PII in accordance with instructions posted elsewhere on this Site. You may also access and correct your personal information and privacy preferences by emailing or writing us at the contact information provided at the end of this Policy. Please include your name, address, and/or email address when you contact us.

We encourage you to promptly update your PII if it changes. You may ask to have the information on your account deleted or removed; however, some information, such as past transactions, may not be deleted. In addition, it may be impossible to completely delete your information without some residual information because of backups.

#### **6. Security of Your PII**

At our Site you can be assured that your PII is secure, consistent with current industry standards. We strive to take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure, or destruction of your PII. For example:

- We work hard to ensure that the data we collect is reliable, accurate, complete, and current. We encrypt all PII, in order to prevent unauthorized parties from viewing such information when it is transmitted to us. We also only keep collected information only for as long as reasonably necessary and use it only for the purposes for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements.
- We limit access to PII only to specific employees, contractors, and agents who have a reasonable need to come into contact with your information. For example, we may provide

members of our technical support team with limited access to your account in order to allow them to troubleshoot problems you may be having with the Site.

- Additionally, we also employ a number of physical, electronic, and procedural safeguards to protect PII. Our secure servers and our data centers are protected by industry-standard encryption, and our servers reside behind firewalls and employ high-level password protection.
- Finally, access by you to your PII is available through a password and unique customer ID. This password is encrypted. We recommend that you do not divulge your password to anyone.

In order to most effectively serve you, credit card transactions and order fulfillment are handled by established third party financial institutions and processing agents. They receive the information needed to verify and authorize your credit card or other payment information and to process your order.

Unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your PII, you acknowledge that: (a) there are security and privacy limitations inherent to the Internet which are beyond our control; and (b) the security, integrity, and privacy of any and all information and data exchanged between you and us through this Site cannot be guaranteed.

## **7. Miscellaneous**

You must be at least 18 years old to have our permission to use this Site. Our policy is that we do not knowingly collect, use, or disclose PII about minor visitors.

If you have any questions, concerns or inquiries about our Privacy Policy, or our use of your PII, or our privacy practices, please contact us at:

**Illinois Credit Union League**  
**PO Box 3107**  
**Naperville, Illinois 60566-7107**  
**Email: [MarketingStaff@LSC.net](mailto:MarketingStaff@LSC.net)**