# **Privacy Statement**

The Student Choice Online Privacy Statement ("Statement") explains how we collect, use, protect, and share your information. This Statement applies when you visit studentchoice.org websites or affiliated/co-branded websites that display this Statement.

This Statement differs from the Privacy Notice provided to you by your credit union. Additionally, because this website is hosted separately from your credit union's website, the online practices described in this Statement may differ from your credit union's online privacy policy. Please visit your credit union's website to view their privacy information:

This statement may differ from the Privacy Notice provided to you by Credit Union Name, found by visiting cuwebsite.org.

### Information We Collect

### **Personal Information**

When you visit our website, or use our online services, Student Choice may collect personal information about you that you provide such as your name, birth-date, email address, mailing address, phone number, account numbers, government identification numbers such as your social security numbers or driver's license number, and username/password.

### **Website Usage Information**

Student Choice may also collect non-identifying information about your use of our online services. For example, we may capture the IP address or mobile ID number of the device you use to connect to our online services, the type of operating system and browser you use, and the screen settings on your browser or device. We or our third-party partners may also capture information about the site you came from, the parts of our online service that you access, and the sites you visit next. We or our third-party partners may also use tacking technologies such as cookies, pixels, and other similar technologies to collect and store information

about your visit to our website or use of our online services. We do not link this automatically collected data to any personal information.

#### Information We Collect from Other Sources

When providing you our services, Student Choice may also collect personal information about you from other third-party sources such as information you provide to our third-party vendors during the loan application process, information obtained from your credit union, or information obtained from a credit reporting agency. We may combine this information with other personal information we have collected about you under this Statement.

### How We Use the Information We Collect

We may use the information discussed above:

- to respond to inquiries and fulfill your requests
- to notify you about important information regarding products and services that you applied for or in which you are enrolled
- to verify your identity
- to prevent fraud and enhance the security of your account or our online services
- to manage your preferences
- to perform analytics of your use of our online services (e.g.: the webpages and advertisements you have viewed)
- to deliver non-interest-based internet advertisements
- internally to evaluate and improve our business operations
- to comply with legal requirements, relevant contractual obligations, and our internal policies.

### Who We Disclose Your Information To

Student Choice may share the information it collects from you with its third-party partners. For instance, Student Choice may share your information:

• with service providers, such as data processors to assist in the recordkeeping and administration of your account records

- with legal representatives, to assist in the drafting and executing of required account documents
- with the credit union through which you are obtaining our products or services
- with consumer credit bureaus
- with certain third-parties to comply with legal requirements, court orders, or to prevent fraud.

Student Choice does not share your personal information with third parties for the purposes of marketing.

### **Internet Tracking**

### **Use of Tracking Technologies**

Both Student Choice and the companies we work with may use cookies, pixel tags, local shared objects, and other tracking technologies for certain purposes, including to monitor our advertising and marketing campaign performance, and to prevent fraud. Student Choice does not use tracking technologies to collect unencrypted personal information.

- **Cookies:** Cookies are small packets of data sent by a website and stored on a user's web browser. Each time the user loads the website, the browser sends a cookie back to the website to inform the user's prior activity. Cookies may allow us or our third-party service providers to document your use of our websites over time so that we may customize your experience. Cookies also allow us to monitor the effectiveness of certain marketing campaigns. You may disable the use of cookies by our websites by adjusting your browser settings, but this will limit the functionality available to you on future visits.
- **Pixel Tags:** Pixel Tags, also known as web beacons or clear GIFs, are transparent images embedded in a web page or email which track whether a user has accessed the content. Pixel tags may be used in emailed advertisements or whenever you otherwise interact with a Student Choice advertisement on a webpage.
- Local Shared Objects: Also known as "flash cookies," local shared objects are
  pieces of data that websites that use Adobe Flash may store on a user's computer
  hard drive. Local shared objects operate similarly to cookies, but they cannot be
  managed by adjusting browser settings. <u>Information on how to manage local</u>
  shared objects.

#### Do-Not-Track

Some browsers incorporate a Do Not Track feature that signals to websites you visit that you do not want to have your online activity tracked. Tracking is not the same as using or collecting information about your use of a single website. For these purposes tracking refers to collecting information from consumers who use or visit a website or online service as they move across different websites over time.

How browsers communicate the Do Not Track signal is not yet uniform. Thus, this site is not yet set up to interpret or respond to Do Not Track signals communicated by your browser. Even so, as described more fully throughout this Online Privacy Statement, we limit our use and collection of your personal information.

<u>Learn more about Do Not track protocols</u> for browsers and mobile devices, and the choices available to you.

### **Links to Third-Party Websites**

Student Choice may provide links to non-Student Choice websites. If you use an online link to visit a third-party website, you will be subject to that website's privacy and security policies which may differ from ours. If you are asked to provide information on one of these websites, we urge you to review their privacy policies before sharing your information.

# <u>Advertising</u>

Student Choice advertises online (e.g.: through both affiliated and unaffiliated URL web pages, mobile apps, and company managed social media accounts) and offline (e.g.: through direct marketing). We may use the information we collect (described above) about you to provide both tailored and untailored ads to you in various online and direct marketing advertising campaigns.

# How we may tailor ads:

- **Relationship-based Advertising:** to provide advertisements and offers that are relevant to you, we may use information about your relationship with us (e.g.: your types of accounts; age; transactional information; or the state in which you live).
- **Third-party Advertising:** Student Choice contracts with third-party companies to advertise our products and services on our behalf. We may both use aggregated and de-identified data, and data provided by you to determine which types of advertisements and offers to deliver to you. We do not allow third-party companies to collect data for their own marketing purposes.
- Online Behavioral-based Advertising (also known as Interest-based Advertising): Student Choice does not engage in online behavioral advertising.

# **Security**

Student Choice uses physical, electronic, and procedural security measures that comply with government standards and guidelines to safeguard information. We have policies and procedures that restrict our employees', agents', and contractors' access to information about you. They have access to your information only on a business need-to-know basis. When you provide information on Student Choice web-sites, we use technology to encrypt and privately transfer your information to our network.

# **Updating Your Information**

Keeping your account information accurate and up to date is very important. If your account information is incomplete, inaccurate or not current, please contact us to update your information.

### Information from Children Online

Our online services are not intended for children under 13. We do not knowingly collect personal information for children under 13 without parental consent.

# Changes to Student Choice's Online Privacy Statement

Student Choice's Online Privacy Statement is subject to change and will always bear the date of the last update. Please review it periodically. Access the previous version of this Privacy Statement.

# Questions or Concerns about Student Choice's Online Privacy Statement

If you have any questions related to this policy, please contact:

Credit Union Name c/o Credit Union Student Choice, LLC. 1001 Connecticut Avenue NW - 10th Floor Washington, DC 20036

*Effective Date: 6/11/2019*