

Effective: 10/8/2021

FirstLight Federal Credit Union Online Banking Privacy Policy

We understand how important personal privacy is to you. As a result, we have adopted the following Online Privacy Policy, in order to better serve you, our Member. This Online Privacy Policy ("Policy") only relates to the information FirstLight Federal Credit Union ("FLFCU," "FirstLight," "we," "us") collects online through our online banking platform and mobile banking application (collectively, our "online services"). We ask that you read this Policy carefully. By using any of our online services, you consent to this Policy.

This Policy is in addition to our Annual Privacy Notice. We'll use and share any information that we collect from or about you in accordance with the Annual Privacy Notice.

Privacy Concerns of Our Members

Your privacy and security concerning your personal affairs is of the utmost importance to us. We have implemented standards and procedures designed to prevent the misuse of information you have entrusted to us. These standards and procedures are based on applicable federal laws and state statutes that govern how we handle your account with us.

Collection and Retention of Member Information

We automatically collect the date and time of your visit, the internet provider address you were assigned, and the pages you access on our web site. If you participate in any surveys and/or site registrations, we retain that information as well. The information we obtain from you remains strictly confidential. Examples of how member information may be used include, but are not limited to: 1) To improve our web site; 2) To notify you about updates or enhancements to our web site; 3) To contact you for special promotions.

Collection and Retention of E-Mail Addresses

If you choose to provide us with your e-mail address, it will be used in the manner specified by you. This information will not be sold to third parties. If you authorize it, we provide your e-mail address to a third party vendor we hire to provide services to you.

Collection and Retention of Member Information in the Mobile App

We offer you the ability to access some of our products and services through our Mobile Application (App). When you interact with us through the Mobile App, we may collect information regarding your mobile device such as device settings, unique device identifiers, information about your location, and analytical information that may assist with diagnostics and performance. For your convenience, you may be asked to grant permission for access to your mobile device's geolocation data. This information may be collected when you use certain services that are dependent on your mobile device's location (such as the location of ATMs or branch locations).

CHILDREN'S ONLINE PRIVACY PROTECTION ACT (COPPA)

FirstLight is committed to protecting the online privacy of the children who visit our online services and complying with COPPA. In general, our online services are not directed to children under the age of 13,

and we request that children do not provide personal information through our online services. We do not knowingly collect or share personal information from children under the age of 13 without parental consent.

LINKS TO THIRD-PARTY SITES

FirstLight uses third-party vendor sites to enhance your ability to use online financial tools. When you leave FLFCU's website, the links you may access are for your convenience and are for informational purposes only. Any products and services accessed through these links are not provided or guaranteed by FLFCU. The sites you visit may have a privacy policy that is different from FLFCU's. Please review that site's privacy policy. FLFCU does not endorse the content contained in any of these sites or the organization(s) publishing these sites and hereby disclaims any responsibility for such content. FLFCU does not represent either the third party or the member if the two enter into a transaction.

Access to Confidential Information by Employees

Your right to privacy is a top priority. We have policies and procedures that limit our employees access to personal information regarding your account. Through our standard operating procedures, we educate our employees regarding the need for confidentiality associated with our members accounts.

Maintaining Accurate Member Information

Our goal is to ensure your records are current, accurate, and complete. If you make us aware of inaccurate information, we will respond to your inquiry in a timely manner.

Our Security Procedures to Protect Information

We use security features on our FLFCU Online Banking and Mobile App to help prevent unauthorized access to your information. FLFCU maintains strict security controls to ensure privacy and financial security. We use physical, electronic, and procedural safeguards that comply with applicable federal and state laws to protect and limit access to personal information. This includes device safeguards and secured files. FLFCU requires passwords and PINs, including encryption and security measures such as multi-factor authentication, to access accounts through our online services. You are responsible for the confidentiality of passwords/PINs. While we strive to use commercially acceptable means to protect your personal data, we cannot guarantee its absolute security.

Disclosure of Member Account Information

We may provide personally identifiable information about you to a third party, such as a vendor or service company, that we hire to prepare your account statements or to provide support or services for one or more of our products. These vendors and service companies have agreed to safeguard our confidential information about you, and any products and services that you use.

Except as stated above, we will not knowingly reveal any account information or other personally identifiable information to a third party not affiliated with FLFCU, unless one of the following applies: 1) The information is required in order to complete a transaction initiated by you; 2) You request or authorize the disclosure of information; 3) We are required or allowed to by law; or 4) The information is provided to a reputable credit bureau or similar information reporting agency.

E-mail sent to FLFCU may be used by the credit union's staff and volunteers to answer questions, to follow up on suggestions or to improve the level of service FLFCU provides. E-mail may not be secured and is subject to interception by unauthorized individuals. Therefore, if you wish to communicate sensitive or personal information, you may send it by postal service or use our secure messaging options. Use of this system constitutes consent to security testing and monitoring. ALL network traffic on this system is constantly monitored for security, copyright, and statistical purposes.

If you have any questions or comments concerning our Privacy Policy, you may contact us by logging into online banking and submitting a secure email to us or by telephone via our Member Contact Center at 915.562.1172 (El Paso) or 575.526.4401 (Las Cruces) or 1.800.351.1670 (toll free).

FIRSTLIGHT FEDERAL CREDIT UNION'S PRIVACY POLICY IS SUBJECT TO CHANGE AT ANYTIME WITHOUT NOTICE. NO PROVISIONS CONTAINED HEREIN SHALL BE DETERMINED TO CHANGE OR ALTER ANY OTHER CONTRACTS OR POLICIES BETWEEN FIRSTLIGHT FEDERAL CREDIT UNION AND ITS MEMBERS.

LAST UPDATE: 10/08/2021