

# Privacy Notice

Rev. October 1<sup>st</sup>, 2013



6377 S. Revere Pkwy., Suite 200  
Centennial, CO 80111  
Local: 720-974-1311  
Toll-Free: 866-472-8841  
Email: [cudcprivacy@cudc.org](mailto:cudcprivacy@cudc.org)  
Website: [www.CUDirectConnect.com](http://www.CUDirectConnect.com)

FACTS SUMMARY	HOW CU DIRECT CONNECT HANDLES YOUR PERSONAL DATA
What information is collected?	<p>The types of information we collect and share depend on the services that you transact with us, or with your financial institution through us. This information can include:</p> <ul style="list-style-type: none"> <li>• Name, address, Social Security number, phone numbers, employment and income</li> <li>• Credit history and credit scores</li> <li>• Email address</li> <li>• Web related information (browser used, time spent on site, etc.)</li> </ul> <p>Only information relevant and necessary to complete the purpose for which it was intended or to help us improve the services provided to you will be collected. For additional information, please review section "<a href="#">Collection of Information</a>" below.</p>
Reason for collecting information	<p>The information collected may be used to complete various financial transactions for which you apply, to offer services directly to you or to provide services to you on behalf of your financial institution. We may also use the information to improve the functionality and delivery of information on our websites. For additional information, please review section "<a href="#">How We Use Information</a>" below.</p>
How is information secured?	<p>To secure personal information against unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and facilities. We also restrict access to nonpublic personal information about you to those authorized employees and third party personnel who need to know the information to provide products or services to you. For additional information, please review section "<a href="#">Security for Privacy</a>" below.</p>
How is information shared and can you limit it?	<p>Federal law gives consumers the right to limit some but not all sharing of personal information. We may share information within our organization for everyday business and marketing purposes. We may also share information with our financial affiliates and trusted third parties to obtain additional information necessary to complete financial transactions or other business processes. Information requested and necessary for legal proceedings or investigations may be shared as required by law. For additional information, please review section "<a href="#">How We Share Information/Disclosures to Third Parties</a>" below.</p>
Is consent needed to collect information?	<p>Information submitted to us is processed and handled in accordance with this Privacy Notice. By submitting information, you acknowledge and agree to the terms of this privacy notice. You consent to the use and retention of information for the purposes it was intended. You also consent to the potential transfer of information within our organization and with financial affiliates and/or trusted third parties assisting us in providing services to you. For additional information, please review section "<a href="#">Choice and Consent</a>" below.</p>
Can you access or dispute your information?	<p>You may request access or dispute information that is collected by us using any method below:</p> <ul style="list-style-type: none"> <li>• Call: (720) 974-1311 or (866) 472-8841</li> <li>• Email: <a href="mailto:cudcprivacy@cudc.org">cudcprivacy@cudc.org</a></li> <li>• Write to: CU Direct Connect – ATTN: Privacy Team, 6377 S. Revere Pkwy, Suite 200, Centennial, CO 80111</li> </ul> <p>Your request will be handled by a Privacy Team member and you will be directed to the appropriate source of the information. For additional information, please review section "<a href="#">Access to Information</a>" below.</p>
Is this policy reviewed and enforced?	<p>This privacy notice is compliant with appropriate state and federal laws and follows the recommendations set forth in the Generally Accepted Privacy Principles (GAPP) developed by the American Institute of Certified Public Accountants (AICPA). For additional information, please review section "<a href="#">Monitoring, Enforcement and Updating</a>" below.</p>

## CU Direct Connect Privacy Practices

This Privacy Notice (Notice) has been structured in accordance with the privacy principles contained in the AICPA GAPP.

### ***Purpose for Collecting Personal Information***

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CU Direct Connect may collect information about you to complete various financial transactions for which you apply or to make those transactions more efficient and faster for both you and your financial institution. We may offer services directly to you or provide services to you on behalf of your financial institution. We may also use the information to improve the functionality and delivery of information on our websites.

### ***Choice and Consent***

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By submitting information directly to us you acknowledge and consent that:

- you have read and understand the contents of this Privacy Notice.
- you agree to our collection, storage and processing of your information.
- we may obtain additional information as necessary for the purpose of delivering services to you.

Information is not saved permanently to CU Direct Connect's systems until you formally submit your request. Failure to complete the submission process will result in your information being removed and will require you to reenter information again if you wish to apply for services in the future.

Any information that we may obtain from affiliates or trusted third parties is bound by their privacy policies and is used by CU Direct Connect only for the purposes for which it was intended.

If you chose to opt-in to email notifications or newsletter subscriptions from one of our websites, those emails and/or newsletters from will contain a method for you to unsubscribe from receiving future transmissions.

Consent for the use and sharing of personal information provided directly to CU Direct Connect may be withdrawn or modified, as allowed by this notice, by using any method below:

- Call: (720) 974-1311 or (866) 472-8841
- Email: [cudcprivacy@cudc.org](mailto:cudcprivacy@cudc.org)
- Write to: CU Direct Connect – ATTN: Privacy Team, 6377 S. Revere Pkwy, Suite 200, Centennial, CO 80111

Your request will be handled by a CU Direct Connect Privacy Team member and you will be directed to the appropriate source of the information. If your request falls outside of the limits you are allowed to place on the sharing of your information, you will receive an explanation of the reasons.

### ***Collection of Information***

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We may collect information about you using a variety of methods. Your information may be collected directly from your financial institution in order to fulfill a business process or it could come from you, via our websites, as part of a financial transaction through a financial affiliate. It could be provided from a subscription you sign up for on our websites or an email that you send to us. Your information could also be provided by a trusted third-party such as a credit bureau, or may be collected from web technologies embedded in our websites or online tools.

Some of CU Direct Connect's websites may also use "cookies" to gather information about your visit to those websites. These cookies are used to improve our level of service and speed up the delivery of information to our visitors. Cookies are lines of text that are transmitted to your web browser when you click on a website. They provide a way for a server to recall a previous request or previous registration, or to keep track of a transaction as it progresses, so that information does not have to be repeated. Your browser stores the information on your hard drive and when you return to that website later, the cookie is transmitted back only to the servers that originally sent it to you. Cookies are generally allowed by default, however you can configure your browser to alert you when it is about to receive a cookie

and you can choose to accept or refuse the cookie. You can also configure your browser to not alert you and simply refuse all cookies. Refusing cookies may have adverse effects on the usage, functionality and performance of our websites and CU Direct Connect is not responsible for the functionality or performance of its websites if cookies are disabled. For additional information on the use of cookies and how to configure your browser please review <http://www.allaboutcookies.org/manage-cookies/>.

CU Direct Connect may hire companies such as third party ad services to track and report performance of advertising and marketing campaigns to and from CU Direct Connect and linked websites. We may also use advertising service providers to help us determine which of our advertisements are most likely to be of interest to you. These ad service providers may use behavioral information such as how you navigate the websites to provide relevant advertisements to you. We permit certain companies to set cookies and use related technology, such as tracking pixels. Tracking pixels (also known as action tags, web beacons, or transparent GIF files) and other similar tracking technologies may be used to collect and store information about user visits, such as the user's anonymous cookie ID, page visits and duration, and the specific ad or link(s) that the user clicked on to visit the website. No personally identifiable information is stored on these cookies or web pixels. This user activity information is reported to us in aggregate and is anonymous. We use this information in aggregate to understand, for example, the effectiveness of our advertising and marketing.

Regardless of how information about you is collected, CU Direct Connect makes every effort to insure the security, quality and completeness of the information we receive.

### ***How We Use Information***

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CU Direct Connect's usage of information complies with all current laws and regulations and this Notice and our practices follow content and procedures set forth in the GAPP established by the AICPA. Below you will find additional information about our use of data and which sharing you can limit.

We may use Personal Information:

- to respond to your inquiries and fulfill your requests;
- to send you important information regarding the websites, changes to terms, conditions, and policies and/or other administrative information;
- to send you marketing communications that we believe may be of interest to you;
- to personalize your experience on the website by presenting content, ads or offers tailored to you;
- to allow you to apply for products or services (e.g., to prequalify for an auto loan) and evaluate your eligibility for such products or services;
- to verify your identity and/or location (or the identity or location of your representative or agent) in order to allow access to your information, conduct online transactions, maintain measures aimed at preventing fraud, and protect the security of account and Personal Information;
- to allow you to participate in surveys, sweepstakes, contests and similar promotions and to administer these activities. Some of these activities have additional rules, which may contain additional details about how Personal Information is used and shared;
- to allow you to use our website's financial planning tools. Please note that some planning tools require that you provide Personal Information (e.g., auto loan pre-approval application), whereas others do not (e.g., auto loan calculator). Information that you enter into one of these planning tools may be stored for future access and use. You have the option not to save the information;
- collected through our social media pages and interactions with you to assist in verifying your identity and account status. We may combine this information with information we already have;
- for business purposes, including data analysis, audits, developing and improving products and services, enhancing our websites, identifying usage trends and determining the effectiveness of promotional campaigns;

- for risk control, for fraud detection and prevention, to comply with laws and regulations, and to comply with other legal process and law enforcement requirements.

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### ***Retention and Disposal of Information***

CU Direct Connect will retain your information for as long as necessary to provide appropriate services to you. If you have opted-in to subscriptions from our organization, that information may be retained until you unsubscribe from those services. Information that you may have provided as part of a financial transaction will be retained for a minimum amount of time not less than the term of the financial agreement. Additional information may be retained for longer amounts of time for data analysis, trending purposes and to comply with any legal requirements.

When your information is no longer needed, it will be disposed of using established policies and procedures. These procedures will include both physical and electronic disposal as necessary and CU Direct Connect will take reasonable steps to insure that your information is securely and completely removed from CU Direct Connect's systems and facilities.

Anonymous information obtained from related web technologies may be kept indefinitely for trending and performance analysis to help us improve the functionality of our websites.

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### ***Access to Information***

In some cases, CU Direct Connect is not the originator of the information and does not have direct responsibility for the accuracy or completeness of the data it stores. Examples may include information provided by a credit bureau, by a dealership as part of a credit application, or by our credit union owners about their current and historical members. In these cases, a CU Direct Connect Privacy Team member will provide you with a document listing the information we have in our systems about you and the source of that information. It will be your responsibility as the consumer to contact the organization(s) listed to further inquire, complain, dispute or update any information they provided to us. As these organizations update the information contained within their systems, they will contact CU Direct Connect to update our systems or in some cases the updates will be received from them automatically.

In other cases, you may have provided CU Direct Connect with your information directly as part of a preapproval application (no dealership involved) or as part of an opt-in subscription to newsletters or email notifications. In these cases, a CU Direct Connect Privacy Team member will work with you directly to document and update the information you provided us. We will notify the appropriate financial affiliates or third-party providers and re-request information as necessary using the updated information. You may also be provided with a link to update your own information in the case of email notifications or newsletters sent from CU Direct Connect or from third-party providers on our behalf. Emails and/or newsletters from CU Direct Connect will contain a method for you to unsubscribe from receiving future transmissions.

You may request access or dispute information that is collected by us using any method below:

- Call: (720) 974-1311 or (866) 472-8841
- Email: [cudcprivacy@cudc.org](mailto:cudcprivacy@cudc.org)
- Write to: CU Direct Connect – ATTN: Privacy Team, 6377 S. Revere Pkwy, Suite 200, Centennial, CO 80111

Your request will be handled by a CU Direct Connect Privacy Team member and you will be directed to the appropriate source of the information.

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### ***How We Share Data/Disclosures to Third Parties***

We may share personal information:

- for our everyday business purposes, including but not limited to, processing financial transactions, maintaining accurate information within our organization, data analysis and to respond to court orders and legal investigations;

- for marketing purposes to offer our products and services to you;
- for joint marketing with other financial or nonaffiliated companies;
- for our affiliates' everyday business purposes that may require information about your transactions, experiences or your creditworthiness
- for our affiliates to market to you

We do not share or lease your information with non-affiliates to market to you.

### **What Data Sharing You Can Limit**

Federal law gives you the right to limit the sharing of information in certain ways. You can limit information sharing:

- about your creditworthiness for affiliates' everyday business purposes
- for affiliates to market to you
- for non-affiliates to market to you

State laws and individual company policies may further allow you to limit how your information can be shared. CU Direct Connect additionally provides you to limit the sharing of your information:

- for joint marketing with affiliated and non-affiliated companies

To limit our sharing of data as stated above, you may contact CU Direct Connect using any method below:

- Call: (720) 974-1311 or (866) 472-8841
- Email: [cudcprivacy@cudc.org](mailto:cudcprivacy@cudc.org)
- Write to: CU Direct Connect – ATTN: Privacy Team, 6377 S. Revere Pkwy, Suite 200, Centennial, CO 80111

Your request will be documented and handled by a CU Direct Connect Privacy Team member. If your request falls outside of the limits you are allowed to place on the sharing of your information, you will receive an explanation of the reasons.

Should CU Direct Connect determine to buy, sell, merge or reorganize its business, the disclosure of personal information to prospective or actual purchasers, or the receipt of such information from sellers may occur. CU Direct Connect will attempt to seek appropriate protection for information in these types of situations.

### ***Security for Privacy***

We are committed to protecting your personal information and maintaining its accuracy. CU Direct Connect implements reasonable physical, administrative and technical safeguards to protect your personal information from unauthorized access, use and disclosure. For example, we secure and encrypt the connection used when you submit personal information to us using any of our web forms or when we obtain additional information about you from trusted third-parties, such as credit bureaus. We have secured facilities and file structures limiting your information to only authorized employees and third party personnel who need to know the information in order to provide services to you. These privileged users of our systems are authenticated within our online tools and within our facilities and network to establish their identity and the appropriate level of authority they should have when accessing personal information. All of our internal and external security controls are audited by independent third party organizations for confidentiality, integrity and availability.

### ***Quality of Information***

CU Direct Connect maintains accurate, complete and relevant Personal Information for the purposes identified in this Notice. You are responsible for providing necessary and complete information to CUDC in order for the transaction or service you request to be properly handled. Failure to provide complete or accurate information may result in CUDC's inability to complete your request.

To help insure the quality and completeness of information provided by you or others on your behalf, we may employ various techniques including but not limited to required fields and historical information fields. We may request historical information such as previous address or previous employer when the length of time at your current address or employer is not adequate to establish a complete picture of your personal history.

Using information about you, we may also collect identity, fraud and credit history information from one or more of the three major credit bureaus or other providers of such information. This third-party information is then combined with information you provided in order to get a more complete and accurate personal financial history in order to provide a product or service to you or your financial institution.

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### ***Monitoring, Enforcement and Updating***

CU Direct Connect monitors its privacy policies, including this Notice, to insure compliance with the most recent state and federal laws and is audited to insure compliance with the requirements set forth in the GAPP established by the AICPA. Our organization also monitors itself to insure that internal processes and procedures meet the requirements of this Notice.

If inquiries, complaints or disputes associated with CU Direct Connect's privacy policies, including this Notice, are brought to our attention, please allow us 30 days to document and respond to your request. All documented inquiries, complaints, disputes and their associated resolutions will be monitored on a periodic basis, but no less than annually, to insure that the appropriate actions were followed and to determine if changes to procedures and/or policies should be implemented to further improve our services.

When we need to update this privacy statement or modify it in a way that does not impact our usage of personal information we will post a notice for 30 days on sites that are covered by this Notice. If we are going to use your personal information in a manner different from that stated at the time of collection, we will notify you directly, and you will have a choice as to whether or not we can use your personal information in such a way.

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### ***Other Online Practices***

#### **Linked Internet Website Practices:**

CU Direct Connect may provide access to information, products or services offered on websites that are owned or operated by other organizations ("third party websites"). We provide this access through the use of hyperlinks that automatically move you from a CU Direct Connect website to the third party site.

While we do our best to provide you with helpful, trustworthy resources, CU Direct Connect cannot endorse, approve or guarantee information, products, services or recommendations provided at a third party website. CU Direct Connect may not always know when information on a linked site changes, therefore, CU Direct Connect is not responsible for the content or accuracy of any third party website. CU Direct Connect shall not be responsible for any loss or damage of any sort resulting from the use of a link on its websites nor will it be liable for any failure of products or services advertised or provided on these linked websites.

CU Direct Connect offers you links on an "as is" basis. When you visit a third party website by using a link on a CU Direct Connect site, you will no longer be protected by this Notice. The data collection, use and protection practices of the linked website may differ from the practices of CU Direct Connect websites. You should familiarize yourself with the privacy policy and security practices of the linked website as those are the policies and practices that will apply to your use of any linked website.

#### **Advertising on our Sites:**

CU Direct Connect advertises our products and services, including prescreened offers of credit, on pages within our websites. These advertisements may take the form of banner ads, splash ads, and other formats. CU Direct Connect may also allow affiliates and non-affiliates of our program to advertise products and services on our websites in the form

of banner ads, splash ads and other formats. CU Direct Connect is not responsible for the fulfillment of any affiliate or non-affiliate offer or promotion downloaded from our websites. The organization associated with the advertisement is responsible for all fulfillments of their promotions.

#### **Social Media Sites:**

CU Direct Connect provides experiences on social media platforms including, but not limited to, Facebook®, Twitter®, Google+® and LinkedIn® that enable online sharing and collaboration among their registered users. Any content you post on official CU Direct Connect managed social media pages, such as pictures, information, opinions, or any Personal Information that you make available to other participants on these social platforms, is subject to the Terms of Use and Privacy Policies of those respective platforms. Please refer to each platform's Terms of Use and Privacy Policies to better understand your rights and obligations with regard to such content.

#### **Definitions**

<b>Affiliate:</b>	Companies related by common ownership, control or contractual agreement. They can be financial or nonfinancial companies. Examples of our affiliates are credit unions and auto dealerships.
<b>Non-affiliate:</b>	Companies <u>not</u> related by common ownership, control or contractual agreement. They can be financial or nonfinancial companies. Examples of non-affiliates could include warranty services, insurance companies or auto service providers. Personal Information is not shared, leased or otherwise provided to non-affiliates.
<b>Trusted Third Party:</b>	Companies that provide additional services necessary to complete business processes. Examples could include credit bureau providers such as Experian®, Equifax® and Trans Union®. Trusted third parties are contractually obligated to provide security and privacy of personal information they receive and to only use it for the purposes it was provided.
<b>Joint marketing:</b>	A format agreement between CU Direct Connect and an affiliated or non-affiliated* company where we jointly market financial or service related products to you. Examples may be automotive dealerships, insurance companies or other financial service providers. *Personal Information is not shared directly with non-affiliated organizations. CU Direct Connect handles all marketing coordination with non-affiliates so your data remains secure.