

# Website Privacy Policy

Capstone Federal Credit Union

## **We care about you...**

And we value our relationship with you as a Credit Union member. Trust is primary in that relationship. We recognize our responsibility to keep the information you provide to us secure and confidential. Along with protecting your financial assets, protecting your privacy is our top priority. Our Privacy Policy is designed to do just that. This Policy is provided to you as required by law. Please read it carefully and keep it for your records..

## **PROTECTING YOUR PRIVACY**

Our **Privacy Policy** explains how we protect the privacy of your personal information. It also describes certain situations where we release information about you to third parties, such as to maintain your account or other circumstances as required or permitted by law.

Our Privacy Policy also provides guidance on how you can direct us not to share certain information within our affiliated family of companies and with certain nonaffiliated third parties. It is your right to Opt Out. We are required to send you a copy of our Privacy Policy annually, yet if you choose to limit the sharing of information, you will only need to make your Opt Out request once.

As long as you maintain a relationship with us, you will receive notice of our Privacy Policy annually. If our information collection or sharing practices change, we will provide you with a revised Privacy Policy. If you have a joint account with someone else or have a co-borrower, please give this Privacy Policy to them to ensure that each of you is aware of our policy and your options. Our Privacy Policy is always available on request. This revised Privacy Policy replaces our previous Privacy Policy.

## **CONFIDENTIALITY AND SECURITY**

We maintain physical, electronic, and procedural safeguards to protect your information, and we restrict access to your information by employees and authorized agents.

## **SCOPE OF OUR POLICY**

Our Privacy Policy governs Member Information, which is defined as personally identifiable, non-public financial information about a member or their relationship with us. The Policy applies to individuals who obtain products or services from us in the United States for personal, family, or household purposes. Our Privacy Policy applies to Member Information obtained by Capstone Federal Credit Union.

## **INFORMATION OBTAINED FOR YOUR BENEFIT**

We obtain information about you that we believe will be necessary or useful in processing or servicing your savings and loan accounts. Your information also enables us to provide products, services, and other opportunities that we think will be of interest to you. We obtain the following types of Member Information:

- Information you provide on applications or that you provide to us verbally or in writing, such as your name, address, Social Security number, and information about your assets and liabilities
- Information we receive about your transactions and experiences with the Credit Union, our affiliates, and other third parties, such as your original loan amount, the outstanding balance of your loan or account, your payment history, and the parties to the loan
- Information we receive from consumer reporting agencies, such as your credit score or credit history
- Information we receive from other third parties, such as information available in the public records.

## **Who May Receive Your Information?**

### *Information Sharing With Our Affiliated Companies*

To give us a complete understanding of your relationship with us, to provide you with efficient and convenient service, and to inform you of new products and services, we may share all of the types of Member Information we obtain about you, as described in this Policy, with our affiliated companies in accordance with the Fair Credit Reporting Act. For example, we may share the information you provide to us, your transaction and experience information, your credit reporting information, and any other information that we may collect about you. Affiliated companies who may receive this information include financial service providers who offer financial planning, investment, and insurance services. Our affiliated companies also include nonfinancial service providers who provide services to us and our members, such as ATM and shared branch deposit networks and marketing service providers. Unless the information-sharing falls under another exception, you may request that we not share this information with our affiliates by exercising your right to Opt Out as further described below in the Opt Out section of this Privacy Policy.

### *Information Sharing with Nonaffiliated Third Parties*

To inform you of product and service opportunities that may be of interest to you, we might share the following types of Member Information that we obtain about you with nonaffiliated third parties:

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- Information about your identity, such as your name and address
- Information about your transactions and experiences with us, such as your original savings or loan amounts, the outstanding balance of your savings and loans, your savings and loan numbers, your payment history, and the parties to the savings and loan accounts
- Information we receive from other third parties, such as information available in public records.

**Companies who may receive this information may include:**

- Financial service providers such as credit card issuers, insurance companies and agencies, securities broker-dealers, automobile loan lenders, and mortgage loan companies and brokers
- Nonfinancial companies including marketing companies, mailing houses, and printing companies.
- Unless the information sharing falls under another exception, you may request that we not share this information with nonaffiliated third parties by Opting Out as described in the Opt Out section of this Privacy Policy.

*Information Sharing with Companies that Perform Services on Our Behalf*

We may share all of the types of Member and Customer Information we obtain about you, as described in this Policy, with companies that perform services on our behalf, to the extent permitted by law. For example, to maintain and service your accounts or to fulfill your transaction requests, we share information with nonfinancial companies that provide services to us, such as data processing companies, printing companies, mailing companies, and marketing companies.

We may continue to do so even if you choose to exercise your Opt Out rights as described below. All of these companies are obligated to keep the information we provide to them confidential and to use the information only to provide the services we have asked them to perform for us.

*Information Sharing in Other Situations*

We may share all of the types of Member Information that we obtain about you in other legally permitted situations that are not subject to your right to Opt Out, including but not limited to:

- If we have your consent to a disclosure for a specific purpose
- To complete your transaction and maintain your account, such as recording of deeds of trust and mortgages in public records
- In response to a subpoena, a fraud investigation, or other legal process
- To credit bureaus or similar reporting agencies and with others who ask for credit references in accordance with the Fair Credit Reporting Act
- To regulatory agencies and auditors
- To another financial institution or entity that purchases your loan or account, or if we sell or merge parts of our business
- To another company that we hire to collect on your account
- To affiliates, investors, servicers, rating agencies, mortgage insurers, due diligence firms, and others in connection with loan sales and securitizations

In addition, we may disclose Member Information about you to other nonaffiliated and affiliated third parties not described in this notice as permitted by law. We may continue to do so even if you choose to exercise your Opt Out rights as described below.

**YOUR RIGHT TO “OPT OUT”**

As described throughout this Privacy Policy, you have the right to Opt Out of the sharing of information as described above in the sections entitled “Information Sharing with Our Affiliated Companies” and “Information Sharing with Nonaffiliated Third Parties.” To Opt Out of our information sharing to the extent permitted by this Privacy Policy, follow the instructions below. On receiving your Opt Out Request, we will update our records to indicate your preference regarding the sharing of Member Information within a reasonable period of time.

If you have a joint account with someone else or are a co borrower, either of you may Opt Out and it will be effective for both.

If you wish to exercise any of your Opt Out rights as described above, you may Opt Out in one of three ways:

- **Fill out an Opt Out Request Form** and send it back to us at Capstone Federal Credit Union, Attn: Member Services, 3 Polaris Way 31B, Aliso Viejo, CA 92656.
- Call us toll-free at 800.854.7125 or 949.716.5746.
- Send us a request through E-Branch online email request.

Please be aware that by Opting Out, you may no longer receive promotional or exclusive offers for certain products or services from our affiliated and nonaffiliated third parties. However, please be aware that even if you Opt Out, we will continue to share your information with companies that provide services on our behalf or in certain other situations as permitted by law. Further, please note that your Opt Out Request does not require us to refrain from contacting you, even if we choose to contact you through companies that perform marketing services on our behalf, as described in this Privacy Policy.

#### **OUR FORMER MEMBERS**

Should our member relationship end, this Privacy Policy and your Opt Out preferences will continue to apply to Member and Customer Information we obtained about you.

#### **MAINTENANCE OF ACCURATE INFORMATION**

We strive to keep our records of Member Information about you accurate and up to date. When you notify us of an error, we will update or correct any erroneous information.

## **Online Privacy Policy**

#### **Online information Collection and Use**

We may collect, use, and share the information you provide to us online as indicated under our [Privacy Policy](#).

#### **Security**

We take every precaution to ensure your information remains confidential. The information you provide to us on our Web site is encrypted and protected with an encryption method called Secure Socket Layer (SSL). While on a secure page, the lock icon on the bottom of Web browsers such as Microsoft Internet Explorer becomes locked, as opposed to unlocked or open when you are just 'surfing'.

To send us secure e-mail, you should use our Direct Mail or E-Branch email as Regular Internet e-mail is not secure.

#### **Cookies**

A cookie is a piece of data stored on the hard drive of your computer containing information about you. Cookies do not contain viruses and most cannot review any of your personally identifiable information unless you willingly provide it as a user on a site.

We use cookies to track and target your interest in order to enhance your online experience with us. Any time a cookie is used, the information is encrypted for our use only and protected from third party access.

#### **Log Files**

We use IP addresses to analyze trends and administer the site. IP addresses are not linked to personally identifiable information.

Links Capstone's Web site may contain links to third parties' Web sites. These links are provided for convenience purposes only. If you choose to click to such third party Web sites, Capstone makes no warranties either, expressed, implied or statutory, concerning the content of such Web sites. Capstone does not warrant that such sites or content are free from any claims of copyright or other infringement or that such Web sites or content are devoid of viruses or other contamination. Capstone disclaims all liability of any kind whatsoever arising out of your use of, or inability to use such third party Web sites, the use of your information by such third parties, and the security of information you provide to such third parties. Third party Web sites are not under the control of Capstone. Links to non-Capstone sites do not imply any endorsement of or responsibility for the opinions, ideas, products, information or services offered at such sites, or any representation regarding the content at such sites. Descriptions of, or references to, products, services, or publications of third parties within the Capstone Web site do not imply endorsement of any third party's product, service or publication.

#### **Do Not Track Signals**

Capstone does not employ Tracking Signals on our website, [www.capstonefcu.coop](http://www.capstonefcu.coop). However, our Third Party Partners may employ Tracking Signals. We encourage you to visit their Privacy Policy prior to engaging with their services to ensure they meet your Tracking requirements. Capstone is committed to protecting your privacy and will honor Do Not Track requests if Tracking Mechanisms are utilized in future releases of our website.

#### **Protecting Children's Privacy Online**

From our Web sites, we do not knowingly collect or use personal information from children under 13 years of age.

#### **Changes to Website Privacy Policy**

If our Privacy Policy changes, we will immediately post those changes to our website. Any such changes will be effective upon posting, unless otherwise stated in the change.

#### **Your Choice**

If you want to discontinue your access to Capstone E-Branch Online Banking or make changes to your personal information, call our Member Contact Center at 800.854.7125, or visit our Capstone office. Please note that in some cases a written confirmation may be required.