

Privacy Notice and Policy

Rev. March 20, 2018



6377 S. Revere Pkwy., Suite 200
 Centennial, CO 80111
 Local: 720-974-1311
 Toll-Free: 866-472-8841
 Email: cudcprivacy@cudc.org
 Website:
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"> • Name, address, Social Security Number, phone numbers, employment, and income • Credit history and credit scores • Email address • Web-related information (browser used, time spent on site, etc.) <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 the “Collection of Information” section.</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 the “How We Use Information” section.</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 as well as secured files and facilities. We also restrict access to nonpublic personal information about you to authorized employees and third-party personnel who need to know the information to provide products or services to you. For additional information, please review the “Security for Privacy” section.</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. Certain state laws may provide you with additional rights. We may share information within our organization for everyday business and marketing purposes. We may also share information with affiliated companies and trusted non-affiliated companies to complete transactions requested by you or for other business processes. We may share your information as required by law for legal proceedings and investigations. For additional information, please review the “How We Share Information/Disclosures to Third Parties” section.</p>
Is consent needed to collect information?	<p>Information submitted to us is processed and handled in accordance with this Privacy Policy. By submitting information, you acknowledge and agree to the terms of this Privacy Policy. You consent to the use and retention of information as described in this Privacy Policy. You also consent to the potential transfer of information within our organization, with affiliated companies, and with trusted non-affiliated companies assisting us in providing services to you. For additional information, please review the “Choice and Consent” section.</p>
Can you access or dispute your information?	<p>You may request access to or dispute information that is collected by us using any method below:</p> <ul style="list-style-type: none"> • Call: (720) 974-1311 or (866) 472-8841 • Email: cudcprivacy@cudc.org • Write to: CU Direct Connect – ATTN: Privacy Team, 6377 S. Revere Pkwy, Suite 200, Centennial, CO 80111 <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 the “Access to Information” section.</p>
Is this policy reviewed and enforced?	<p>This privacy notice is compliant with appropriate state and federal laws. For additional information, please review the “Monitoring, Enforcement and Updating” section.</p>

CU Direct Connect Privacy Practices

Domains and collection points addressed by this Privacy Policy include:

- www.CUDirectConnect.com

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- www.GetACreditUnionLoan.com
- Consumer preapproval application within www.cudc.org

Purpose for Collecting Personal Information

CUDC 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

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

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

Information is not saved permanently to CUDC's systems until you formally submit your request. Failure to provide complete and accurate information may result in CUDC's inability to complete 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.

If CUDC obtains your information from affiliates or non-affiliates, CUDC will treat that information consistent with the written agreement between CUDC and the affiliate or non-affiliate, if any, and, to the extent not inconsistent with the written agreement, consistent with this Privacy Policy. CUDC will only use such information for the purposes for which it was intended.

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

Consent for the use and sharing of personal information provided directly to CUDC may be withdrawn or modified, as allowed by this notice, by using any of the following methods:

- Call: (720) 974-1311 or (866) 472-8841
- Email: 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 CUDC 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

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 an affiliated or non-affiliated company. Your information could be provided to CUDC 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 non-affiliated company such as a credit bureau, or may be collected from web technologies embedded in our websites or online tools.

Some of CUDC'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 CUDC 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/>.

CUDC may hire companies such as third-party advertising services to track and report performance of advertising and marketing campaigns to and from CUDC 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 tracking 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.

If you have configured your browser to send "do not track" signals or taken similar steps to exercise choice regarding the collection of your information online, CUDC does not track the individual browsing.

Regardless of how information about you is collected, CUDC makes every effort to ensure the security, quality, and completeness of the information we receive.

How We Use Information

CUDC's usage of information complies with all current laws and regulations. The following is 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 preapproval 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;

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- 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.

Retention and Disposal of Information

CUDC 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. CUDC will take reasonable steps to ensure that your information is securely and completely removed from CUDC'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.

Access to Information

In some cases, CUDC 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 you submit as part of a preapproval application and/or 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, and upon your request, a CUDC 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 may contact CUDC to update our systems or in some cases the updates will be received from them automatically.

In other cases, you may have provided CUDC with your information as part of an opt-in subscription to newsletters or email notifications. In these cases, and upon your request, a CUDC Privacy Team member will work with you directly to document and update the information you provided us. You may also be provided with a link to update your own information in the case of email notifications or newsletters sent from CUDC or from third-party providers on our behalf. Emails and/or newsletters from CUDC 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 of the following methods:

- Call: (720) 974-1311 or (866) 472-8841
- Email: 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 CUDC Privacy Team member. Once your identity has been verified, you will be directed to the appropriate source of the information.

How We Share Data / Disclosures to Third Parties and Affiliates,

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;

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- for marketing purposes to offer our products and services to you;
- for joint marketing with affiliated or non-affiliated 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, rent, lease, or otherwise provide your information to 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. CUDC additionally allows you to limit the sharing of your information:

- for joint marketing with affiliated and non-affiliated companies

California law requires that we obtain your consent before sharing your information with non-affiliated companies in certain circumstances. If you are a California resident, please see section titled "Important Privacy Choices for Customers".

To limit our sharing of data as previously stated, you may contact CUDC using any of the following methods:

- Call: (720) 974-1311 or (866) 472-8841
- Email: 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 CUDC 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 CUDC 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. CUDC 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. CUDC 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 non-affiliated companies, 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

CUDC maintains accurate, complete, and relevant personal information for the purposes identified in this Privacy Policy. 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 and accurate information may result in CUDC's inability to complete your request.

To help ensure 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 to get a more complete and accurate personal financial history in order to provide a product or service to you or your financial institution.

Monitoring, Enforcement, and Updating

CUDC will periodically update this Privacy Policy and its privacy practices to ensure compliance with the most recent state and federal laws. CUDC also monitors itself to ensure it satisfies the obligations set forth in this Privacy Policy.

If inquiries, complaints, or disputes associated with CUDC's privacy practices, including this Privacy Policy, 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 ensure 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 Policy 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 Privacy Policy. 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.

Other Online Practices

Linked Internet Website Practices:

CUDC may provide access to information, products, or services offered on websites that are owned or operated by non-affiliated companies. We provide this access through the use of hyperlinks that automatically move you from a CUDC website to the website of a non-affiliated companies.

While we do our best to provide you with helpful, trustworthy resources, CUDC cannot endorse, approve, or guarantee information, products, services, or recommendations provided on a non-affiliated company's website. CUDC may not always know when information on a linked, non-affiliated company's website changes. Therefore, CUDC is not responsible for the content or accuracy of any non-affiliated company's website. CUDC will not be responsible for any loss or damage of any sort resulting from the use of a link on its websites, nor will CUDC be liable for any failure of products or services advertised or provided on a non-affiliated company's website.

CUDC offers links to non-affiliated companies' websites on an "as is" basis. When you visit a non-affiliated company's website, by using a link on a CUDC site, you will no longer be protected by this Privacy Policy. The data collection, use, and protection practices of linked non-affiliated companies' websites may differ from the practices of CUDC's websites. You should familiarize yourself with the privacy policy and security practices of a non-affiliated company's website prior to disclosing any personally identifiable information directly to a non-affiliated company.

Advertising on our Sites:

CUDC 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. CUDC 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. CUDC 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:

CUDC 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 CUDC 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

Affiliate:	Any company that controls, is controlled by, or is under common control with CUDC or a Credit Union or Financial Institution that CUDC has a contractual relationship with.
Non-affiliate:	Any company that does not control, is not controlled by, and is not under common control with CUDC, or is not a Credit Union or Financial Institution that CUDC has a contractual relationship with. An example of a CUDC non-affiliate is an auto dealership.
Trusted non-affiliated companies:	Non-affiliated companies that provide services necessary to complete business transaction or processes. Examples could include credit bureau providers such as Experian®, Equifax®, and Trans Union®. Trusted non-affiliated companies are contractually obligated to provide security and privacy of personal information they receive from CUDC and to only use it for the purposes it was provided.
Joint marketing:	A formal agreement between CUDC and an affiliated or non-affiliated company where we jointly market financial or service related products to you. Examples include automotive dealerships, insurance companies, or other financial service providers.
Preapproval Application	An application for a loan associated with a requested dollar amount and term, but does not contain any specific loan collateral.

FACTS

WHAT DOES CU Direct Connect DO WITH YOUR PERSONAL INFORMATION?

Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- Credit history and credit scores
- Employment information and checking account information

How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons {Dealership Name} chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does CU Direct Connect share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes— information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes— information about your creditworthiness	Yes	Yes
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	Yes	Yes

To limit our sharing

Call {720} 974-1311 or (866) 472-8841 – ask for the Privacy Team.

Please note:

If you are a *new* customer, we can begin sharing your information 30 days from the date we sent this notice. When you are *no longer* our customer, we continue to share your information as described in this notice.

However, you can contact us at any time to limit our sharing.

Questions?

Call 720) 974-1311 or (866) 472-8841 – ask for the Privacy Team

What we do	
How does {Dealership Name} protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does {Dealership Name} collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> ▪ Apply for financing ▪ Apply for a lease ▪ Provide employment information ▪ Give us your contact information ▪ Show your driver’s license <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can’t I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> ▪ sharing for affiliates’ everyday business purposes— information about your creditworthiness ▪ affiliates from using your information to market to you ▪ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account—unless you tell us otherwise.
Definitions	
Affiliates	Any company that controls, is controlled by, or is under common control with CUDC or a Credit Union or Financial Institution that CUDC has a contractual relationship with.
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <p><i>An example of a CUDC non-affiliate is an auto dealership.</i></p>
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

(California Customer Only)
Important Privacy Choices for Consumers

You have the right to control whether we share some of your personal information. Please read the following information carefully before you make your choices below. This notice applies to CU Direct Connect and any applicable affiliates.

Your Rights

You have the following rights to restrict the sharing of personal and financial information with our affiliates (companies we own or control) and outside companies that we do business with. Nothing in this form prohibits the sharing of information necessary for us to follow the law, as permitted by law, or to give you the best service on your accounts with us. This includes sending you information about some other products or services.

Your Choices

Restrict Information Sharing With Companies We Own or Control (Affiliates): Unless you say “No,” we may share personal and financial information about you with our affiliated companies.

NO, please do not share personal and financial information with your affiliated companies.

Restrict Information Sharing With Other Companies We Do Business With To Provide Financial Products And Services: Unless you say “No,” we may share personal and financial information about you with outside companies we contract with to provide financial products and services to you.

NO, please do not share personal and financial information with outside companies you contract with to provide financial products and services.

Time Sensitive Reply

You may make your privacy choice(s) at any time. Your choice(s) marked here will remain unless you state otherwise. However, if we do not hear from you, we may share some of your information with affiliated companies and other companies with whom we have contracts to provide products and services.

Name: _____

Account Number(s): _____

Address: _____ City: _____ State: _____ Zip: _____

Signature: _____

To exercise your choice(s), do one of the following: (1) Fill out, sign and send back this form to us at CU Direct Connect, Attention: Privacy Team, 6377 S. Revere Parkway, Centennial, CO 80111 (2) Call : (720) 974-1311 or (866) 472-8841 (3) Email us at cudcprivacy@cudc.org