

# Online Privacy Statement

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Effective: July 1, 2021

We are committed to protecting your privacy and providing you with a positive experience on our website and while using our online services.

## What this Statement covers

This Online Privacy Statement (“Privacy Statement”) describes how we collect information when you visit or use our website located at [www.tulsafederalcu.org](http://www.tulsafederalcu.org), including its subpages (the “Site”), and when you access and use any of our mobile applications and/or online services (“Online Services”). The Online Services are subject to separate terms and conditions concerning the use of such Online Services. This Privacy Statement also describes how we use and share such information and explains your privacy rights and choices. The Site and our Online Services are intended for a U.S. audience. The terms “Credit Union,” “we,” “us,” or “our” mean the credit union’s whose site you are visiting. “You” means any individual who visits our Site and/or uses our Online Services.

## What this Statement does not cover

This Privacy Statement does not apply to the websites, mobile applications, or services of the Credit Union’s affiliates. It also does not apply to non-Credit Union companies, such as our partners or any third-party websites that we link to online through the Site or otherwise. Please review the privacy policies of other websites and services you visit to understand their privacy practices.

## Other important resources

Our [Privacy Policy](#) applies to information that we collect about individuals who seek, apply for, use, or obtain our financial products and services.

By visiting and/or using our Site and/or any of our Online Services, you agree to the terms and conditions of this Privacy Statement and consent to the use of online tracking technologies as described below.

## Collection of Your Personal Information

We collect information in a variety of contexts, including:

- Directly from you. We collect information directly from you, such as when you apply or register for our products and services, use our online banking services or mobile apps, communicate with us, respond to surveys, provide feedback, or enter contests or promotions.
- Automatically when you use our Online Services. We and others on our behalf may collect Device Data, Online/Mobile Activity Data, and other information automatically when you interact with us online. Learn more about our use of [Cookies and Data Collection](#).

This Privacy Statement applies to information we collect when you access and use Site and/or our Online Services. We may combine that information with information we collect in other contexts,

such as from our phone calls and emails with you, from third-party data sources for fraud prevention, or from identity verification sources.

## Types of Information Collected

Depending on how you interact online with us, we may collect various types of information. For example, when you sign up for or use a financial product or service online, we may collect:

- Contact or identity data, such as your name, mailing address, email address, phone number, date of birth, government-issued identifier (e.g., Social Security number or driver's license), citizenship, username and password, and other information that directly identifies you.
- Account-related data, such as member/account number, credit/debit card number, account history, account balances, loan details, vehicle or property information, information about beneficiaries and joint account holders, and other information related to your Credit Union accounts, applications, or inquiries.
- Transaction data, such as credit/debit card purchases, payment or transaction history, transaction details when you transfer money to or from your Credit Union accounts, and third-party billing information or statements.
- Demographic data, such as gender, marital status, age, household size/composition, education level, income, occupation, and employment status.

When you browse our website or use our mobile apps, we may also collect:

- Device data, such as your device type, web browser type and version, operating system type and version, photos (e.g., to deposit checks), internet protocol address, mobile network information, general location (e.g., city, state, or country), precise location (e.g., latitude/longitude to find a nearby Credit Union branch or ATM, or when entering/exiting a specific location), cookie IDs, mobile advertising IDs (e.g., Apple's IDFA or Google's Advertising ID), and device IDs (collectively, "Device Data").
- Online/mobile activity data, such as login data, search history, information about how you use and interact with our Site and/or any of our Online Services or advertising (including content viewed, links clicked, and features used), when and how often you use our Site and/or any of our Online Services, referrer URL, and crash reports (collectively, "Online/Mobile Activity Data").
- Marketing data, such as your marketing preferences, information about products or services we think you might like, and inferences based on your interactions with us or our partners (e.g., Online/Mobile Activity Data used for targeted advertising).
- Communications data, such as your communication preferences and details or the content of your communications with us (e.g., email and chat messages).
- Survey and research data, such as your responses to questionnaires, surveys, requests for feedback, and research activities.
- Additional Information On Our Mobile Application - The Credit Union Mobile App ("the App") accesses the following information about your activity and device location. The App collects location data to enable "Pulsate" messaging, even when the App is closed or not in use. Specifically, the following pieces of information are collected by the App:
  - Location – Used for geofencing and beacon scanning essential for advertising/marketing campaign delivery
  - UserID – Pulsate creates a random user GUID upon initial app access, which is later used during every connection with Pulsate. This GUID is unique for each device/app and changes after every app reinstall. This ID is used for identifying a user and sending campaigns.
  - Product Interaction – Pulsate tracks user's app entry, app exit, and pages viewed within the app.

- Name – Pulsate collects user’s first name for product personalization purposes.

This information may be used for creating targeted communications, offering you products or services that fit your needs, determining your closest Service CU Branch, ITM, or ATM, or determining where you are performing your banking transactions.

If you disclose any information relating to other people to us or to our service providers when you visit or use our Site and/or any of our Online Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Statement.

## Cookies and Online Tracking Technologies

We and third-party providers acting on our behalf use a variety of online tools and technologies to collect information when you visit or use our Site and/or any of our Online Services, including Device Data and Mobile/Online Activity Data.

For example, we use these tools to collect information for debugging, fraud prevention, and other necessary purposes. We also use these to conduct personalization, analytics, and targeted advertising on or through our Site and/or any of our Online Services. We may associate this tracking data with your Credit Union account (if you have one).

These tools include:

- Server logs. Server logs automatically record information and details about your online interactions with us. For example, server logs may record information about your visit to our Site on a particular time and day.
- Cookies. We use cookies (i.e., small text files placed on your device) and similar technologies (e.g., pixels and pixel tags, ad tags, clear GIFs, and Javascript) – including cookies and technologies from third-party providers – to enable certain features and functionality and to collect additional information that helps us to improve our Site and our Online Services. We may use session cookies (which expire when you close your browser) and persistent cookies (which remain on your device after you close your browser until you delete them or they expire). We use these technologies for security purposes, to help you navigate, to display information more effectively, to better serve you with tailored information, and to gather statistical information about how visitors use our Site and our Online Services in order to continually improve design and functions.

If you do not want data to be collected from your device via cookies, most browsers have a setting that allows you to decline the use of cookies. Some features may not work properly if you decline the use of cookies. To learn more about cookies, please visit <https://www.allaboutcookies.org/>

## Using Your Personal Information

We use information for various purposes depending on how you interact with us. For example, we may use your information for providing, maintaining, and servicing your accounts; processing transactions and or payments; verifying your identity; detecting and preventing fraud; protecting against security risks; advertising and marketing; conducting analytics and research; improving our

products and services; and carrying out legal and business purposes. Our [Privacy Policy](#) provides additional information about how we share information we obtain when offering financial products and services.

## Sharing Your Personal information

We may share information with service providers with whom we work, such as data processors and companies that help us market products and services to you. When permitted or required by law, we may share information with additional third parties for purposes including response to legal process. Our [Privacy Policy](#) provides additional information about how we share information we obtain when offering financial products and services.

## Keeping Information Secure

We have an information security program that includes administrative, technical, and physical measures to protect information within our company. If you feel that the security of any data that we hold about you has been compromised, please immediately notify us of the problem by [contacting us](#). Visit our [Digital Security](#) page for more information and tips about how to protect against fraud and identity theft.

The Credit Union will never request sensitive account information through unsolicited phone calls or e-mail messages. If you receive an unsolicited phone call or e-mail message claiming to be from the Credit Union or any other group requesting that you provide your account numbers, Social Security number, personal identification numbers (PINs), passwords, or other confidential information, please do not divulge any information or click on any links. Report the suspected fraudulent activity to the [Member CARE Center](#).

## Retention of Personal Information

We will retain your personal information as needed to fulfill the purposes for which it was collected. We will retain and use your personal information as necessary to comply with our business requirements, legal obligations, resolve disputes, protect our assets, and enforce our rights and agreements.

## Children's Privacy

Our Online Services are not directed to children under the age of 13. We also do not knowingly collect personal information from children under 13 through our Site and/or any of our Online Services, and request that children do not provide information to us through our Site and/or any of our Online Services.

## Social Media

The Credit Union has official pages on social media services such as Facebook, Instagram, Pinterest, LinkedIn and YouTube. Any posts you make on our official social media pages — including posts that contain pictures, comments, suggestions, opinions, complaints, or personal information — are available to others who use those pages. Never include sensitive personal,

financial, or other confidential information such as your Social Security number, account number, phone number, mailing address, or email address when posting or commenting online. Please refer to the privacy policies of the social media companies hosting social media pages when you interact with them online.

## Updates to This Privacy Statement

We may make changes to this Privacy Statement from time to time. The “Effective Date” at the top of this page shows when this Privacy Statement was last revised. Any changes will become effective when we post a revised version of this Privacy Statement on our Site. Your use of our Site and/or any of our Online Services are subject to the terms in the version of this Privacy Statement that is posted on our Site at the time of your visit. We encourage you to review this Privacy Statement periodically to remain informed about how we are protecting and may use and disclose your data.

## Contact Us

If you have questions about this Privacy Statement or our privacy practices, please [contact us](#).