

## PRIVACY POLICY

Your privacy is important to us. While Leaders Credit Union (Leaders) assists you with your financial services needs, you can rely on us to protect and hold your information in confidence and to take those steps necessary to prevent fraud. Our in-person and online services include, without limitation:

- Our financial accounts and certificates
- Our credit and debit card programs
- Our loan programs
- Our website
- Our Online Banking service
- Our Mobile Banking App known as “[Leaders Credit Union](#)”
- Our Mobile Debit and Credit Card Control App known as “[Leaders Card Controls](#)”

This Privacy Policy explains what information we collect; why and when we collect it; the extent to which we share it; and how it is protected by us and by you. This Policy does not replace any Service Agreements, Terms of Use, or any other Terms and Conditions (collectively, Agreement) associated with your use of a product or service offered by Leaders. In the event of a conflict between the terms of this Policy and the terms of an Agreement, this Policy’s terms will govern and control with regard to the matters addressed in this Policy.

For purposes of this Policy, the terms “we”, “us”, and “our” refer to Leaders and may also refer to contractors and service providers engaged by Leaders to support their business activities, as may be required. The terms “you”, “your”, and “yours” refer to any person who accesses or uses a product or service offered by Leaders.

## POLICY CHANGES

The information contained in this Privacy Policy is subject to change at any time and in our sole discretion. Please review the Policy and information periodically as your use of or access to the product(s) or service(s) will be deemed to constitute effective notice of changes or amendments to this Privacy Policy.

## QUESTIONS

Please contact us with questions about this Privacy Policy by calling 731-664-1784; by writing to Leaders Credit Union, P.O. Box 10008, Jackson, TN 38308; or by emailing us at [marketing@leaderscu.com](mailto:marketing@leaderscu.com)

## INFORMATION LEADERS COLLECTS

The personal and sensitive information collected depends on the services and/or products you have with us. It may include:

- Name, home address, email address, telephone number(s), and Social Security Number
- Account number(s), transactions, and balances
- Payment history
- Credit history and credit scores

If you use an online service or product offered by Leaders, then the collected information may also include:

- Unique device identifiers such as Media Access Control (MAC) and Internet Protocol (IP) addresses
- Browser type, version, language, and display/screen settings
- Information about how you use and interact with our Apps such as links clicked and pages visited
- Your location a/k/a geolocation data when consent has been given by you with the exception of Our Mobile Debit and Credit Card Control App known as “[Leaders Card Controls](#)” that does not use or collect location data (See [Your Location Information](#) below for more details)

**Children’s Information:** Leaders recognizes the importance of protecting privacy especially where children are involved. We do not direct online products and/or services to individuals under the age of 13, and we request that these individuals do not provide personal information through our online products and services. We do not knowingly collect personal information from children under 13.

**Accuracy of Information:** It is very important to keep your personal information accurate and up to date. If your personal information is incomplete, inaccurate, or not current, please contact us with the correct information as soon as possible through one of the methods listed in this Policy’s Questions section or, if you use one of our App services, use the “Contact Us” feature.

## WHY & WHEN LEADERS COLLECTS INFORMATION

Leaders collects information to provide better services and products to you and its other members. Some ways the information may be used is to:

- Verify your identity;
- Maintain your account(s);
- Process your transactions and applications;
- Manage, assess, and enhance our operations for the benefit of our members (owners) by improving our products and services;
- Comply with applicable legal requirements, contractual obligations, and our policies;
- Personalize your experience on, facilitate the navigation of, and more effectively display information on our Website or Apps;
- Recognize your device in order to allow access to your account and to otherwise enhance security controls connected to the use of our online products and services;
- Enable online services' features such as card controls, fraudulent card use alerts, locating ATMs and/or branches;
- Allow you to participate in surveys, contests, and similar promotions; and
- Respond to your requests and communicate with you.

Leaders collects your information when you actively provide it to us and when you use our services and/or products through your use of our online services and through your computer, smartphone, tablet, or other mobile device by the use of cookies and similar tracking technologies such as beacons, tags, pixels, and scripts. Our cookies and tracking technologies do not contain or capture unencrypted personal information, but they allow us to collect information such as browser type, time spent on our Website or App, pages visited, language preferences, and your relationship with us. For example, information is collected when you:

- Inquire or provide feedback about our products and services
- Open an account
- Apply for a loan
- Consent to receive Text (also called Short Message Service or SMS) messages
- Use your credit or debit card
- Pay your bills
- Make deposits to or withdrawals from your Leaders accounts

**Your Location Information:** Your location may be determined with differing degrees of

accuracy through the use of technology such as GPS; IP address; Wi-Fi access points; cell towers; and Bluetooth-enabled devices. Your location a/k/a geolocation data is only collected if you have authorized it. You can change your permissions for the collection of your geolocation data at any time in your device's settings.

Leaders collects location data to enable features like locations of ATMs and Branches close to you at that moment, card controls to detect card use and provide alerts to help prevent fraudulent transactions, and ads based on your general location, even when [Leaders Credit Union App](#), which is for its mobile banking services, is closed or not in use. Leaders other App service is [Leaders Card Controls App](#), which is for its mobile debit and credit card controls. [Leaders Card Controls App](#) does not use and, therefore, does not collect your location data.

## SHARING YOUR INFORMATION

Personal information collected from and about you will not be sold by Leaders, but it may be used and shared in accordance with applicable federal laws and regulations and may continue to be used and shared when you are no longer our member. These laws and regulations do give consumers such as you the right to limit some but not all sharing. Our Consumer Privacy Notice, for which a link may be found below in [Other Useful Resources](#), provides you with a description of how we collect, share, and protect your personal information in a format prescribed by federal law for all financial institutions. The information within the Consumer Privacy Notice is contained within this Privacy Policy, but it is presented differently between the documents.

Leaders like all financial institutions needs to share its members' personal information to run its business and fulfill its members' needs. The permitted reasons for which Leaders shares your personal information are:

- Our everyday business purposes;
- Our marketing purposes; and
- Our joint marketing with other financial companies.

You do not have the option to limit the sharing of this information.

Other permitted reasons for which Leaders could, but does not currently, share your personal information are:

- Our affiliates' everyday business purposes involving information about your transactions and experiences;

- Our affiliates’ everyday business purposes involving your creditworthiness information;
- Our affiliates’ marketing purposes to you; and
- Our nonaffiliates’ marketing purposes to you.

Federal law allows you to limit only:

- Our affiliates’ everyday business purposes involving your creditworthiness information;
- Our affiliates’ marketing purposes to you; and
- Our nonaffiliates’ marketing purposes to you.

State laws and individual companies may give you additional rights to limit sharing. Leaders does use Google services with its two Apps and Website and as a result, your information may be shared with Google. The use of the Google Analytics service allows us to better understand how our Website and Apps are being visited and used. Google Analytics collects information such as how often users visit our Website and Apps, what pages they visit when they do so, and what other sites they used prior to coming to our Website or App. Google Analytics collects the IP address assigned to you on the date you visit our Website or App, rather than your name or other identifying information. We do not combine your information collected through the use of Google Analytics with your personally identifiable information. Although Google Analytics plants a cookie on your web browser to identify you as a unique user the next time you visit our Website or App, the cookie cannot be used by anyone but Google. You may review further information about how Google Analytics collects and processes data and how to control the information sent to Google at its webpage on “How Google uses information from sites or apps that use our services” that can be found at [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners).

We do not pass or assign your consent to receive Text (SMS) messages from Leaders to any third party such that you receive Texts on behalf of such third party. We also do not share your phone number with a third party such that you receive Texts on behalf of such third party.

## PROTECTION OF INFORMATION

**By Leaders:** Leaders uses security measures that comply with applicable federal and state laws to protect your personal information from unauthorized access and use. These measures include computer and device safeguards; secured files and buildings; procedural safeguards; information security and confidentiality requirements for our vendors; safe record storage; and, for members using our online services, encryption technology such as Secure Socket Layer (SSL) that protects

the information as you enter and submit it through our online services. In the event of a data breach, timely notification will be provided to you in accordance with applicable laws and regulations.

**By You:** Emails sent through the “regular internet” and Text (SMS) Messages are not secure. You should never send sensitive or confidential information in or attached to an email that is not secure. This includes, without limitation, information or images containing information such as your Social Security Number, Account Number, or PIN Number.

## RETENTION OF INFORMATION

Leaders retains your information for the period of time necessary to:

- Conduct business with you;
- Satisfy with our legal obligations; and
- Comply with applicable federal and state laws and regulations.

Once such time period has elapsed, your information is securely deleted in accordance with applicable federal laws and regulations.

## HOW WE USE TEXT (SMS) MESSAGES

If you have consented to receive Text (SMS) Messages from Leaders, you can expect to receive the below types of messages by Text.

- Members: Updates regarding your Leaders’ accounts, loans, cards, or other relevant information
- Job Applicants: Updates about your application status, onboarding, or other relevant information
- Non-members: Information about our products, services, promotions/specials, community activities, or other relevant updates

Some of the standard messaging disclosures the recipient can expect to receive.

- Messaging frequency may vary
- Message & data rates apply
- Reply STOP to opt-out
- Reply STOP to unsubscribe at any time
- Reply HELP for support
- Visit our [Privacy Policy](#) for more information including how we use Text messaging

## LINKS TO OTHER SITES

The information and disclosures contained in this Privacy Policy apply only to our services. Our Online services and our website may provide links to third party sites such as credit bureaus, service providers, or merchants. If you use such links, you should review their privacy and security policies and other terms and conditions as they are not controlled by and may differ from Leaders' Privacy Policy. Leaders does not guarantee and is not responsible for the privacy or security of these sites including, without limitation, the accuracy, completeness, or reliability of their information.

## OTHER USEFUL RESOURCES

The below links and references are other resources you may use to learn more about our practices in general and as it relates to privacy.

- [Leaders' Consumer Privacy Notice](#) provides a description of our information sharing activities and your rights to limit it in a format used by all financial institutions
- Leaders' Disclosures and Agreements may be accessed by one of the following methods:
  - Log into your Leaders online banking account
  - Log into your Leaders mobile banking app and view under the "More" section
  - Visit any Leaders branch

## KEY TERMS

**Affiliates:** Companies related by common ownership or control to Leaders.

**Cookies:** Small files containing a string of characters sent and stored directly on the device you are using when you visit a website or online app. You can configure your browser to refuse all cookies or to indicate when a cookie is being sent. However, some features or services may not function properly without cookies.

**Device:** Computer used to access online services among other things. Examples are desktop computers, tablets, and smartphones.

**IP Address:** Number assigned to a device connected to the internet and that is generally assigned in geographic blocks such that it may be used to identify the location of the device.

**Joint Marketing:** Agreement between Leaders and a Non-Affiliated financial company to market financial products or services to you.

**Non-Affiliates:** Companies not related by common ownership or control to Leaders.

**Unique Identifiers:** String of characters that may be used to identify a particular browser, app, or device. These unique identifiers may sometimes be reset by users, may vary in how permanent they are, and may vary in how they are accessed.