

RBFCU MASTERPASS ONLINE PRIVACY NOTICE

RBFCU Credit Union (RBFCU) respects your concerns about privacy. This Privacy Notice applies to the *RBFCU MasterPass* and/or *MasterPass Online* (collectively, "*RBFCU MasterPass Services*"). It describes the types of information we collect in connection with the *RBFCU MasterPass Services*, the purposes for which we collect such information and with whom we may share it. Our Privacy Notice also describes the measures we take to protect the security of the information. We also tell you about your choices with respect to your personal information, and how you can reach us to update your contact information or get answers to questions you may have about our privacy practices.

1. Information We Collect About *RBFCU MasterPass Services* Users

a. Nonpublic Personal Information Provided by You

- Information we receive directly from you upon enrollment, on applications or other forms;
- Information about your transactions using the *RBFCU MasterPass*, including but not limited to stock-keeping unit data, description of items, quantity, price and subtotal, and payment cards registered with the *RBFCU MasterPass*; and
- Information collected through the Mobile *RBFCU MasterPass* application such as geo-location information.

In connection with your use of *RBFCU MasterPass Services*, we ask for certain nonpublic personal information such as your name, home address, billing address, shipping address, telephone number, email address, user name, password, answers to our security questions, and payment card information. We collect nonpublic personal information about you from the following sources:

b. Nonpublic Information Provided by Participating Merchants

In connection with your use of *RBFCU MasterPass*, we receive certain nonpublic information from participating merchants about orders placed on their websites, including but not limited to, merchant name, currency, amount, date and time of order, and information whether it was completed or not. This information is provided in a de-identified manner.

c. Nonpublic Information from Participating Services Providers, Developers and Admins

In connection with Service Providers', Developers' and Admins' provision of services on behalf of Merchants and other partners of *RBFCU MasterPass Services*, we receive certain nonpublic information from participating Service providers, Developers and Admins when an account is being created on their behalf. Such information includes, but is not limited to, service providers' and developer's name, username, password, email address, country of residence, phone number, legal business name, tax identification number, Service Provider Type (Shopping Cart, Payment Gateway, etc.), and the number of merchants served (1-10, 11-99, etc.).

d. Information We Collect Automatically When You Visit Our Website

We also may collect certain information by automated means (such as cookies and web beacons) when you visit our website.

Cookies. Like many companies, we may use “cookies” on our websites. Cookies are bits of text that are placed on your computer’s hard drive or your mobile device’s memory when you visit certain websites. Cookies may enhance your online experience by saving your preferences while you are visiting a particular website and facilitating your navigation through a site. We may use cookies to tell us, for example, how many users visited our websites and the pages accessed, user’s shopping behavior and preferences, whether you have visited us before or if you are a new visitor, to help us identify site features in which you may have the greatest interest, to tell your preferences and personal settings and previous activities performed by you. Much of this data may be collected on an anonymous basis. This information allows us to make improvements and updates to our website, and to determine the effectiveness of our promotions and campaigns. Most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies. Please note, however, that without cookies you may not be able to take full advantage of all our website features.

Web Beacons. Certain pages on our website may contain “web beacons” (also known as Internet tags, pixel tags and clear GIFs). Web beacons do not typically collect any other information than what your browser provides us with as a standard part of any internet communication. These web beacons allow us to obtain information such as the IP address of the computer that downloaded the page on which the beacon appears, the URL of the page on which the beacon appears, the time the page containing the beacon was viewed, the type of browser used to view the page and the information in cookies. We do not use them to identify individual users personally. If you turn off cookies, the web beacon will no longer be able to track your specific activity. The web beacon may, however, continue to collect information about visits from your IP-address.

2. How Do We Use the Information We Collect

We may use the information we obtain about you to:

- Create and manage your online account, provide our products and services, and to you respond to your inquiries;
- Validate your payment card information;
- Provide, administer and communicate with you about products, services and promotions (including contests, sweepstakes, programs and other offers), including the display of customized content and advertising;
- Protect against and prevent fraud, unauthorized transactions, claims and other liabilities, and manage risk exposure and franchise quality;

- Operate, evaluate and improve our business (including developing new products and services; managing our communications; determining the effectiveness of our advertising; analyzing our products, services and websites; facilitating the functionality of our websites; and performing accounting, auditing, billing, reconciliation and collection activities);
- Assist third parties in the provisions of products or services that you request from third parties;
- Monitor the use of and improve our interactive assets;
- Perform data analyses (including anonymization of personal information) to determine, among other measurements, business performance, number of registrants, channels, transaction spend and site performance;
- Enforce our [RBFCU MasterPass Consumer Terms of Use](#), Comply with applicable legal requirements and industry standards and our policies;
- We also may use the information in other ways for which we provide specific notice at the time of collection;
- Perform auditing, research and analysis in order to maintain, protect and improve our services.

3. Information We Share

We do not sell or otherwise disclose nonpublic personal information we collect about you, except as described herein or otherwise disclosed to you at the time the data is collected.

We share information to perform payment card transactions and to perform the services that you request. We may share the personal information we collect with our affiliates, financial institutions that issue payment cards or process payment card transactions, entities that assist with payment card fraud prevention, and merchants. For example, in this context we provide financial institutions with information about their cardholders' transactions that RBFCU processes. We may share aggregated, de-identified and other [non-personally identifiable information](#) with participating merchants, wallet providers and financial institutions. For example, we may share information to show trends about the general use of *MasterPass* Online.

We also may share the information with our service providers who perform services on our behalf. We do not authorize these service providers to use or disclose the information except as necessary to perform certain services on our behalf or comply with legal requirements. We require these service providers by contract to appropriately safeguard the privacy and security of personal information they process on our behalf.

On our websites, you may choose to use certain features for which we partner with other entities. These features, which may include social networking and geographic location tools, are operated by third parties that are not affiliated with RBFCU. These third parties may use personal information in accordance with their own privacy policies. On sites on which these features are offered, the relevant

third parties are identified on the websites. We strongly suggest you review the third parties' privacy policies if you use the relevant features.

We also may disclose information about you (i) if we are required to do so by law or legal process, (ii) to law enforcement authorities or other government officials, or (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity.

We also reserve the right to transfer personal information we have about you in the event we sell or transfer all or a portion of our business or assets. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use personal information you have provided to us in a manner that is consistent with this Privacy Notice. Following such a sale or transfer, you may contact the entity to which we transferred your personal information with any inquiries concerning the processing of that information.

4. Your Choices

You may have certain rights regarding the personal information we maintain about you. We offer you certain choices about what personal information we collect from you, how we use that information, and how we communicate with you.

You can at any time tell us not to send you marketing communications by e-mail by clicking on the unsubscribe link within the marketing e-mails you receive from us and by changing your settings on your preferences page. You also may opt-out of receiving marketing e-mails from MasterCard by [clicking here](#). We will apply your preferences going forward. In some circumstances, withdrawing your consent to RBFCU's use or disclosure of your personal information will mean that you cannot take advantage of certain RBFCU products or services.

As indicated above, we may anonymize personal information to perform data analyses. If you would like to opt-out from data analytics, [click here](#).

You may opt out of certain uses of information we collect about you by automated means when you visit our website. Specifically, we may use cookies to collect information about your website visits. To opt out of aggregation and analysis of data collected on our websites, please [click here](#).

You may be able to link your device to the *RBFCU MasterPass* by using Intel Identity Protection Technology ("IPT"). Additional disclosures about data processing through IPT will be provided upon enrollment.

Subject to applicable law, you may have the right to request access to and receive information about the personal data we maintain about you, update and correct inaccuracies in your personal data, and have the information blocked or deleted, as appropriate. The right to access personal information may be limited in some circumstances by local law requirements. To update your preferences, ask us to remove your information from our mailing lists or submit an access request, please contact us as specified below.

6. How We Protect Personal Information

We restrict access to nonpublic personal information about you to those employees who need to know that information to provide products or services to you. We maintain reasonable administrative, technical and physical safeguards that comply with state and federal regulations to protect the nonpublic personal information we have about you.

We also take measures to destroy or permanently de-identify personal information when there is no longer a business need to keep the information and in any case, for no longer than 13 months from the last time you have logged on to your account. The types of measures we take vary with the type of information, and how it is collected and stored.

7. Links to Other Websites

Our websites may provide links to other websites for your convenience and information. These websites may operate independently from RBFCU. Linked sites may have their own privacy notices or policies, which we strongly suggest you review if you visit any linked websites. To the extent any linked websites you visit are not owned or operated by RBFCU, we are not responsible for the sites' content, any use of the sites, or the privacy practices of the sites.

8. Data Transfers

We may transfer the personal information we collect about you to countries other than the country in which the information was originally collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to other countries, we will protect that information as described in this Privacy Notice.

9. Updates to Our Privacy Notice

This Privacy Notice may be updated periodically and without prior notice to you to reflect changes in our personal information practices. We will post a prominent notice on the *RBFCU MasterPass* website to notify you of any significant changes to our Privacy Notice and indicate at the top of the notice when it was most recently updated.

If you have any questions or comments about this Privacy Notice or if you would like us to update the information we have about you or your preferences, please [click here](#). You may also contact us by writing to:

RBFCU
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