

# Notre Dame Federal Credit Union

## Online Privacy Policy

Last updated: May 12, 2015

**Summary:** Protecting your privacy is important to us. Please read our Privacy Policy below to learn how we treat information you provide.

We want our users to be aware of any information we collect, how we use it, and under what circumstances, if any, we disclose it. We respect each site visitor's right to personal privacy. To that end, we collect and use information throughout our Website only as described in this Privacy Policy. This statement applies solely to information collected on this Website.

**Collecting Information:** The information we collect is never shared with other organizations for commercial purposes and used only for internal Website traffic reporting. We may collect, analyze and store general statistical information of your usage of the site (such as your IP address, browser type, originating domain names, access times and referring website addresses).

This site uses a first party cookie to track visitor activity on our website. We use this information to improve the content of our sites, as well as, to provide visitors with a more relevant overall experience with our organization and our site. As mentioned earlier, we never share information you provide us with 3rd parties.

If you fill out a web form on this site your information will be stored in our CRM system and/or CMS and some amount of your past browsing on this site may be available to our staff to determine your interests so we may more effectively engage with you and so we may improve our site. If you do not wish for us to have your personal information please do not fill out any of the web forms on this site. We never sell or give away this information.

Through our site, you may be able to post or discuss content. In most cases your content and name that you provide will be made publicly available to the website community. Your email address will not be made publicly available to the website community. By contributing to the Website in this way, you are giving Notre Dame Federal Credit Union permission to republish and use this information as per the Terms of Use, located in the privacy section of the Website.

**How We Use Information:** If you provide your email address to us, we may use it to respond to or update you on your inquiries.

We may partner with third parties such as Google to monitor activities on our website including Web traffic, statistics, and/or other activities in order to improve browsing experiences on our

website. Our partner may use cookies, Web beacons, and/or other monitoring technologies to compile statistics about website visitors.

If you receive a suspicious email from Notre Dame FCU, please forward it to [ndfcu@NotreDameFCU.com](mailto:ndfcu@NotreDameFCU.com) and then delete it from your mailbox. And remember, we'll never contact you via email to confirm your personal information.

**Links:** This site may contain hyperlinks to third party websites, and while Notre Dame Federal Credit Union makes all reasonable efforts to hyperlink to websites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices of third party websites. As such, we encourage you to review the privacy statements of websites you choose to link to from the site so that you can understand how those websites collect, use and share your information.

**Data Security:** At Notre Dame Federal Credit Union, we make your safety and security a top priority and are committed to protecting your personal information. If we collect any information from you like your name, email address, or IP address, this data will be securely stored on our internal servers. For more information about our commitment to security, visit our Security section of our Website.

**Children:** Our website is not intended or directed at any children who are twelve years of age and under. We operate in compliance with the Children's Online Privacy Protection Act. We do not knowingly collect or use personally identifiable information from anyone 12 years of age or under. If you are 12 years of age or under, please do not use our site.

**Changes:** We reserve the right to change these privacy practices in the future. If we make any changes, we will change the Last Updated date above.

**Effective Date: 06/29/2023**

## **BIOMETRIC INFORMATION PRIVACY POLICY AND CONSENT**

### **Scope and Overview**

This policy outlines how Notre Dame Federal Credit Union, its vendors, and/or the licensor of Notre Dame Federal Credit Union's consumer verification software processes biometric data collected from you for identity verification and fraud prevention purposes.

### **Biometric Data Defined**

As used in this policy, biometric data includes "biometric identifiers" and "biometric information". "Biometric identifier" means a retina or iris scan, fingerprint, voiceprint, or scan of hand or face geometry. As the term is used in this policy, the selfie photograph you upload to the software for use in the biometric algorithm is considered a "biometric identifier." "Biometric information" means any information, regardless of how it is captured, converted, stored, or shared, based on an individual's biometric identifier used to identify an individual.

### **Disclosure and Authorization Policy**

To the extent Notre Dame Federal Credit Union, its vendors, and/or the licensor of Notre Dame Federal Credit Union's consumer verification software collect, capture, or otherwise obtain biometric data relating to a consumer, Notre Dame Federal Credit Union must first:

Inform each consumer Notre Dame Federal Credit Union, its vendors, and/or the licensor of Notre Dame Federal Credit Union's consumer verification software are collecting, capturing, or otherwise obtaining the consumer's biometric data, and Notre Dame Federal Credit Union is providing such biometric data to its vendors and the licensor of Notre Dame Federal Credit Union's consumer verification software;

Inform the consumer of the specific purpose and length of time for which the consumer's biometric data is being collected, stored, and used; and

Receive consent by the consumer authorizing Notre Dame Federal Credit Union, its vendors, and/or Notre Dame Federal Credit Union's consumer verification software to collect, store, and use the consumer's biometric data for the specific purposes disclosed by Notre Dame Federal Credit Union, and for Notre Dame Federal Credit Union to provide such biometric data to its vendors and the licensor of Notre Dame Federal Credit Union's consumer verification software.

Notre Dame Federal Credit Union, its vendors, and/or the licensor of Notre Dame Federal Credit Union's consumer verification software will not sell, lease, trade, or otherwise profit from consumer's biometric data; provided, however, Notre Dame Federal Credit Union's vendors and the licensor of Notre Dame Federal Credit Union's consumer verification software may be paid for products or services used by Notre Dame Federal Credit Union utilizing such biometric data.

This policy is intended to comply with all federal, state, and local laws.

### **Purpose for the Collection of Biometric Data**

Notre Dame Federal Credit Union, its vendors, and/or the licensor of Notre Dame Federal Credit Union's consumer verification software collect, store, and use biometric data solely for identity verification and fraud prevention purposes.

### **Disclosure**

Notre Dame Federal Credit Union will not disclose or disseminate any biometric data to anyone other than its vendors and the licensor of Notre Dame Federal Credit Union's consumer verification software providing products and services using biometric data without/unless:

First obtaining consumer consent to such disclosure or dissemination;

The disclosed data completes a financial transaction requested or authorized by the consumer;

Disclosure is required by law or ordinance; or

Disclosure is required pursuant to a valid warrant or subpoena issued by a court of competent jurisdiction.

### **Security**

Notre Dame Federal Credit Union shall use a commercially reasonable standard of care to store, transmit and protect from disclosure any biometric data collected. Such storage, transmission, and protection from disclosure shall be performed in the same manner as or more protective than the manner in which Notre Dame Federal Credit Union stores, transmits and protects from disclosure other confidential and sensitive information, including personal information used to uniquely identify an individual or an individual's account or property, such as, account numbers, PINs, driver's license numbers and social security numbers.

### **Retention**

Notre Dame Federal Credit Union shall retain consumer biometric data only until, and shall request its vendors and the licensor of Notre Dame Federal Credit Union's consumer verification software permanently destroy such data when, the first of the following occurs:

The initial purpose for collecting or obtaining such biometric data has been satisfied, such as verification of consumer identity;

Request of consumer to destroy the biometric data; or

Within 30 days of consumer's provisioning of biometric data.

### **Contact Information**

If you have any questions about our use, storage, or security of your biometric data you can contact us at: [ndfcu@NotreDameFCU.com](mailto:ndfcu@NotreDameFCU.com).

### **BIOMETRIC INFORMATION CONSUMER CONSENT**

As outlined in the "Biometric Information Privacy Policy", I understand and consent to the collection, use, retention, storage, and/or disclosure or re-disclosure of data or images from biometric verification technology by Notre Dame Federal Credit Union, its vendors, and/or the licensor of Notre Dame Federal Credit Union's consumer verification software. I acknowledge I have been given a copy of the Policy, or the Policy has been made accessible to me, and I have had an opportunity to review it and request any additional information concerning Notre Dame Federal Credit Union's procedures and safeguards for collecting, maintaining, using, disclosing, sharing, storing, and/or destroying this data.