

**School Employees Lorain County Credit Union
Online Privacy Policy**

Last Reviewed: September 2009

Online Privacy

We respect and value your privacy. Our Online Privacy Policy describes and applies to the information we collect from you when you visit this Web site. The terms "we," "our," and "us" in this Privacy Policy refer to School Employees Lorain County Credit Union, Inc. (SELCCU). Our Privacy Policy generally describes how we collect, share, use, and protect your information. If you are a member who has opened an account or obtained a financial product or service from us for personal, family, or household purposes, our Privacy Notice may apply to you as well and further explains how we may use your information.

1. Information We Collect

When you visit our Web site, we receive and collect certain information about you. The information we receive and collect depends in part on what you do when you visit our Web site. You may be able to improve your experience on our Web site when you tell us who you are - for example, by signing up for e-mail or newsletters, applying for products, making inquiries, or requesting further information about a product or service.

Some of the information you may submit is personally identifiable information, but much of it is not. Examples of personally identifiable include your name, phone number, address, and Social Security number. It is possible to browse our Web site without actively submitting any personally identifiable information.

We may use this information for a number of purposes, for example, to better fulfill your requests and/or inquiries, monitor Web site usage and/or performance, improve the customer experience of our Web site, ensure technological compatibility with your computer, protect against fraud or identity theft, or conduct aggregate analyses on usage patterns.

Automatically Collected Information

Every time you visit a Web site, some information is automatically collected from you. For example, this information may include some or all of the following items: your computer's Internet protocol (IP) address and/or domain; type and version of Internet browser software and operating system you use; date, time, and duration of your Web site access; specific pages, buttons, images, videos, links, or forms that you access while visiting the Web site; and demographic information concerning the country of origin of your computer and the language(s) used by it.

Information Collected via Cookies and Other Similar Technology

“Cookies” are small text files that are placed on your computer to distinguish you from other visitors to our Web site. The use of cookies is a standard practice among Web sites to collect or track information about your activities while using the Web site. We or our third party service providers may place cookies or similar files on your hard drive for many of the reasons listed above while visiting our Web site. Most people do not know that cookies are being placed on their computers when they visit Web sites because browsers are typically set to accept cookies. You can choose to have your browser warn you every time a cookie is being sent to you or you can choose not to accept cookies. You can also delete cookies from your computer at any time. If you refuse cookies, the functionality of our Web site may be impacted or become non-functional.

In addition to using cookies, we or our third party service providers may also use similar technologies to track users’ interactions with our Web site. Some of these technologies include Web beacons (transparent graphical images placed on a Web site) and flash objects.

We may use these technologies on our Web site to verify your identity, remember personal settings including your preferences, to offer you additional options or enhance your online experience, and to improve our products and services. We may also use them for marketing site personalization and tracking of online applications and programs and/or track the effectiveness of advertisements for our products and services, referred to as banner ads, which we may place on our Web site or other linked and/or partner Web sites. Cookies used for tracking advertising effectiveness do not collect personally identifiable information. In order to better serve you, some of these technologies allow us the ability to view your past interactions with our Web sites and/or online banking environment for customer service, troubleshooting, risk analysis and fraud detection, as well as other related purposes.

2. Information You Choose to Submit

For most of the browsing on our Web site, we neither require nor collect personally identifiable information. You can browse our Web site and take as much time as you want to review our services without having to submit such information.

3. e-Mail Communications

Forms of communication such as, e-mail, text messaging, our Web site “Contact Us” or similar forms, or other forms of electronic communication are inherently insecure. Please refrain from submitting sensitive personal information (such as account number or Social Security number) via e-mail or similar method of communication.

When you send an e-mail to us, you are communicating with us electronically and consent to receive reply communications from us or our providers electronically. We may retain the content of the e-mail, your e-mail address, and our response in order to better serve your needs or for legal and regulatory reasons.

4. Personal Information on Children

We respect the privacy of your children and encourage all parents to supervise their children's computer usage. We do not knowingly collect or retain personal information from children under the age of 13. We advise all visitors to our Web site under the age of 13 not to disclose or provide any personally identifiable information on our Web site. To learn more about the Children's Online Privacy Protect Act (COPPA) please visit the Federal Trade Commission's Web site at www.ftc.gov/privacy/privacyinitiatives/childrens.html.

5. Third Party Web Sites

Our Web site may contain links to third party Web sites. These links and pointers to third party Web sites are not part of our Web site. SELCCU is not responsible for any representations or warranties regarding these third party Web sites. We are not responsible for any losses or damages in connection with the information, security, privacy practices, availability, content or accuracy of materials of such third party Web sites. These third party Web sites might have privacy policies different from us and third party Web sites may provide less privacy and/or security than our Web site. We encourage you to review the privacy and security policies of all third party Web sites before you share any personally identifiable information.

6. Additional Uses or Sharing of Your Information

We may use information about your relationship with us, such as what types of accounts you have, as well as transactional information, and the state/region in which you conduct transactions to tailor advertisements to you while you are on our Web site. These advertisements may take the form of banner ads to offer you additional products and services, or enhance your online experience. (See our Member Privacy Policy.)

In addition to those methods discussed in this Privacy Policy, we may use and share your information, including personally identifiable information, without limitation, in the following manner:

- In response to judicial or other governmental subpoenas, warrants and court orders served on us in accordance with their terms, or as otherwise required by applicable law;
- To comply with legal, regulatory or administrative requirements of governmental authorities;
- To protect our rights or property, protect our legitimate business interests, to enforce the provisions of our terms or policies, in cases of customer fraud/disputes, and/or to prevent harm to you or others;
- To protect or defend us, our subsidiaries, affiliates, or parent company and any of their officers, directors, employees, agents, contractors and partners, in connection with any legal action, claim or dispute;
- As disclosed in other applicable policies, terms of use, or other agreements; or

- As permitted or required by law or as authorized by you.

7. Online Security

We maintain security standards that are designed to protect your information as it is transmitted from your computer to our network. This technology is called Secure Socket Layer (SSL). SSL is the leading security protocol for data transfer on the Internet and helps to protect the safety and confidentiality of your online banking information.

8. How to Protect Your Personally Identifiable Information

You have a role in helping us by safeguarding your information from others. You have several options when deciding how you can best protect your personally identifiable information. One option is simply not to volunteer it. The Federal Trade Commission's Web sites (www.ftc.gov, www.ftc.gov/idtheft, and www.onguardonline.gov) offer useful information about how to protect your personally identifiable information.

9. Suspicious e-Mail

We will never e-mail you to request personal account information over the Internet or by any other means. Help protect yourself against online fraud - if you suspect that an unsolicited e-mail is fraudulent, please contact us.

10. Notice to Persons Accessing this Web Site Outside the United States

If you reside outside the U.S., any information you provide to us on our Web site will be transferred out of your country and into the U.S. If you do not want your personally identifiable information to leave your country, do not provide the information to us. By providing personally identifiable information to us, you explicitly consent to the transfer of your information to the U.S.

11. Changes to our Online Privacy Policy

Please note that we will periodically make changes to our Privacy Policy. It is your responsibility to review this Privacy Policy frequently and remain informed about any changes to it, so we encourage you to visit this page often. Your continued use of our Web site constitutes your acceptance of any amendments to and the most recent versions of this Privacy Policy.

12. Questions or Comments

If you have any questions or comments concerning our Privacy Policy please let us know.