



# **U.S. Online Privacy Notice**

**Last updated January 2025**

Your privacy is important to us. Pentagon Federal Credit Union (“**PenFed**”, “**we**”, “**us**”, or “**our**”), is committed to protecting your privacy. We adhere to all applicable laws and apply rigorous standards to ensure personal information we process (collect, use and share) is protected. This U.S. Online Privacy Notice (“**Notice**”) describes how PenFed manages your personal information when you interact with us online through our websites, mobile applications and social sites (“**Sites and Mobile Apps**”) through your computer, smartphone, tablet or other mobile devices (“**computer or mobile devices**”).

## **This Notice describes:**

- How we process personal information when you visit, use, or interact with us online, and through our advertisements displayed through online services operated by us or non-affiliated third parties.
- How we may use or share personal information collected to deliver products and services to you and for advertising purposes.

By using our Sites and Mobile Apps, you agree to the terms and conditions of this Notice. Our U.S. online services covered by this Notice are intended for a U.S. audience.

PenFed works with third-party providers who are contractually obligated to comply with our policies to protect information. However, if you visit or access one of these third-party provider sites or mobile apps, please review the online privacy practices of that site or mobile app to understand the specifics of how they may process your online personal information.

## **Updates to this Notice**

This Notice is subject to change, and we may update this Notice periodically. If we make changes to this Notice, we will revise the **Last updated** date on this page.

## **Our Online Privacy Practices**

We are committed to transparency in how we process your personal information. We ask for your consent when required; otherwise, by using our Sites and Mobile Apps, you consent to the processing of your personal information subject to and consistent with applicable laws, regulations, and other notices you may have received based on your relationship with us.

### **Linking to other sites**

We may provide links to non-affiliated third-party sites, such as credit bureaus, service providers or merchants. If you follow links to sites not affiliated with or controlled by PenFed, you should review their privacy and security policies and other terms and conditions, as they may differ from those of our Sites and Mobile Apps. PenFed does not guarantee and is not responsible for the privacy or security of these sites, including the accuracy, completeness, or reliability of their information.

### **Protecting your personal information**

We maintain physical, technical, electronic, procedural, and organizational safeguards and security measures that comply with applicable federal and state laws to protect personal



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information from accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, or access.

### Keeping your information accurate

It is important that we have accurate and up-to-date information about you. If you notice that your information is incomplete, inaccurate, or out-of-date, you can update your information through our mobile or online service, by contacting us at 1-800-247-5626, or by using the [PenFed website](#). You can also speak to a member service representative at a financial center. You may also write to us at Pentagon Federal Credit Union, Box 1432, Alexandria, VA 22313-2032.

### How we collect personal information online

We collect personal information about you, as permitted and required by law, when you visit or use our Sites and Mobile Apps or otherwise interact with us online. For example, some of the ways we collect personal data include when you:

- Apply for or open a new account
- Register for a new product or service, or request information about a product or service
- Complete a survey, contest or sweepstakes or other promotion

We may use third-party providers to process personal information for business purposes on our behalf. Third-party providers are contractually obligated to comply with our policies to protect information that we share with them, or they collect on our behalf.

### Personal Information we collect online

The type of personal information we collect from and about you online will depend on how you interact with us and may include without limitation:

- Contact information such as name, mailing address, email address, and telephone and mobile phone number(s);
- Membership/Account application information such as credit and income information;
- Identifiers such as Social Security number, account number(s), driver's license number (or comparable), or other information that identifies you for ordinary business purposes;
- Access authorization such as user ID, alias, PIN and password, and security questions and answers;
- Documents or images submitted via our Sites or Mobile Apps to support account opening;
- Information from your computer and mobile devices where allowed by individual browsers and/or operating systems such as:
  - Unique device identifiers (e.g., 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 Sites and Mobile Apps (e.g., activities on pages visited, links clicked, or unique and measurable patterns such as keystrokes, mouse clicks and movements, swipes and gestures);



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- Communications data, such as your communication preferences and details, or the content of your communications with us (e.g., text or chat messages);
- Responses to advertisements on sites and mobile apps where we advertise;
- Log information such as your search and voice to text queries in the mobile app; and
- Geolocation information (e.g., for real time ATM or financial center location, upon request, or for fraud prevention).

### Use of personal information we collect online

We may use information we collect online described in this Notice, as permitted and required by law, and for other purposes which may include but are not limited to:

- Managing your account:
  - protecting your identity and the security of your personal and account information from unauthorized access
  - processing transactions on your account
  - responding to product applications, questions, and complaints
  - personalizing your site experience
  - delivering content, product, and service offerings relevant to your interests
- Fulfilling regulatory requirements;
- Developing and improving our website, mobile app, products, services, and/or member experiences, including testing, debugging, research, analysis, and product development;
- Identifying, monitoring, and responding to fraud, financial crimes, and security breaches;
- Maintaining the safety, security, and integrity of our website, mobile app, products and services, databases, and overall business; and
- Conducting crime prevention and compliance activities such as auditing, reporting, fraud prevention, and anti-money laundering (AML) efforts.

We may combine information we collect online with information we collect in other contexts, such as from our communications with you or from third-party data sources, for marketing purposes, identity verification, or fraud prevention. We will treat such combined information in accordance with this Notice.

California residents covered by the California Consumer Privacy Act may have additional rights. To learn more, California residents can reference PenFed's California Consumer Privacy Act Notice for additional information.

### With whom do we share this information

We may share the personal information we collect from and about you online as described in this Notice (and subject to other legal restrictions and notices you may have received depending on your relationship with us with:

- affiliates of PenFed;
- third-party providers who have contracts with PenFed; and



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- government agencies or other parties as may be required by laws and/or regulations.

### **How to limit sharing**

- You have choices regarding the sharing of some personal information. You can visit our Opt-Out Page to opt out of receiving our promotional emails. Our promotional emails also contain instructions on how to opt out. If you opt out of receiving promotional emails, we may still send you emails for other account servicing purposes.

### **Online tracking technology we use**

We use a variety of online tools and technologies to collect information when you visit or use our Sites and Mobile Apps. We use these tools to collect information for website performance, fraud prevention, session management, debugging, targeted advertising, and other purposes as permitted and required by law.

Tools may include but are not limited to:

- **Cookies.** Cookies are small text files that a website's server stores in your web browser. Cookies allow companies to recognize your device and store information about your account and preferences. We may use cookies to store information about pages visited on our sites, language preferences, or other information that we have associated with you or your device. Your browser's settings may allow you to set your web browser to tell you when cookies are set, delete your cookies, or block cookies altogether. Not accepting cookies could impact how our website functions.
- **Marketing pixels, web beacons, clear GIFs, or other technologies.** This technology may be placed on certain pages of our website, applications, emails, and other marketing initiatives. These tags usually work in conjunction with cookies and allow us to measure the effectiveness of our site and compile statistics about usage and response rates.
- **Software Development Kits (SDKs).** Our mobile applications may include third-party SDKs that allow us and our service providers to collect information about your mobile app activity. In addition, some mobile devices come with a resettable advertising ID (such as Apple's IDFA and Google's Advertising ID) that, like cookies and pixel tags, may allow us and our service providers to identify your mobile device over time for advertising purposes in compliance with applicable app store consent rules.
- **Advertising and Cross-Device Tracking.** PenFed uses certain Adobe Analytics services and products, which help companies build websites, applications, and advertisements that seamlessly flow between all your devices (such as a desktop, laptop, tablet, phone, or smart watch). The Adobe services recognize which of your devices are linked through use of technology that includes cookies and your IP address (without collecting your sensitive personal information). Visit the Adobe website for more information on opting out of certain services, cross-device tracking, and/or to unlink your devices. NOTE: Adobe needs to install a cookie on your browser to identify that you have opted out. If you delete the opt-out cookie, or change devices or web browsers, you will need to opt out again.
- **Server logs.** Server logs automatically record information about your online interactions with us, such as browsing patterns and time and day of website visit.



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### **How we use online tracking technology to conduct targeted advertising**

We and third-party providers may use online tracking technology to collect information about your activities on our Sites and Mobile Apps for targeted advertising purposes as permitted and required by law.

### **Children's Privacy**

We recognize the importance of protecting privacy where children are involved. We do not knowingly collect personal information from children under 13 without prior parental/guardian consent.

### **Social Media**

PenFed has official social media accounts on various platforms. When you interact with us on these platforms, we may collect information such as your likes, interests, feedback, and preferences. We may also collect additional information from such platforms if you choose to share information with them and they, in turn, share such information with us. Please refer to the privacy policies of the relevant social media platforms.

### **Contact Information**

If you have questions or concerns about our treatment of your personal information or about our privacy practices in general, please contact us at [privacy@penfed.org](mailto:privacy@penfed.org) or toll-free at 1-800-247-5626.