

BCU
PRIVACY POLICY
Last Updated May 21, 2025

This Privacy Policy (we refer to it as our “Policy ”) describes how Baxter Credit Union (“BCU” or “we” or “us”) collects, uses, shares, retains, and protects (“processes”) information about you when you (1) visit us at <https://www.bcu.org> or one of the pages thereon (the “Website”) or the mobile app version of the Website; (2) communicate with us or the Website via email and other electronic messages; (3) open an account on our Website or in-person; (4) apply for a loan; (5) use your credit or debit card; (6) pay your bills; (7) make deposits to or withdrawals from the accounts you have with us; and (8) otherwise interact with us online or offline, such as on the telephone and in written correspondence (collectively, our “Services”). We adopt this Policy to fulfill our service commitment to you and comply with legal obligations as we process personal information, as described below.

As a state-chartered and federally-insured credit union, our processing of your personal information is primarily governed by the privacy and security requirements of the Gramm-Leach-Bliley Act (GLBA). Depending on where you live and other factors, some of our processing of your personal information may also be subject to other U.S. data privacy laws. [Our California and Other U.S. State Privacy Laws Policy](#) describes what rights you may have under those laws. It is our intent to comply with any laws or regulations that apply to your personal information.

This Policy does not apply to information processed by any third party, affiliate, or affiliate of a third party, including those that can be accessible via the Website. Please review their policies. BCU is not responsible for the content or the privacy policies or practices of any third parties, third-party websites, or third-party applications.

Before accessing, using, or interacting with the Website, you should carefully review this Policy together with our [Privacy Notice](#) and our [Terms of Use](#), each of which is incorporated by reference and also governs use of the Website. We may change this Policy and Terms of Use from time to time, and encourage you to review them whenever you interact with us.

User Consent: By choosing to use our Services and interact with BCU, including through our Website and by communicating with us via email, telephone, or in

person, you consent to the processing of information as described in this Policy, and you represent that you are at least 18 years old. If you are under the age of 18 or you do not consent to the collection, use, and/or disclosure of your personal information as set forth in this Policy, please exit and do not use our Website or other Services.

How Does BCU Collect Information About Me?

For purposes of this Policy, unless noted otherwise, when we use the term “personal information,” we mean information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked with a particular person or household.

We collect information about you from several different sources. We collect and store information that you give us directly. For example, when you:

- apply to us for a financial product or service;
- pay your bills or check your account balances;
- use your credit or debit card to make purchases;
- make deposits or withdrawals from your accounts; or
- request customer support via our online chat feature or when you reach out to us by phone or email.

We also collect information generated automatically by you when you use our online Services, and from third parties such as credit bureaus.

What Types of Personal Information Does BCU Collect?

We may collect personal information that falls into the following categories:

Identifiers such as real name, alias, physical address, email address, date of birth, telephone number, Social Security number, driver’s license number, passport number, or other similar government identifiers;

Documents such as a driver’s license or other government identification card to verify your identity, or tax or other records to verify your income;

Commercial Information related to our administration of the products or services we provide you, such as your accounts, account numbers, account usernames

and passwords, answers to security questions, deposits, balances, purchases, and payment history;

Internet or Other Network Activity Information related to your use of our Website, mobile app, emails, chat feature, or other digital Services, such as your internet protocol (IP) address, your browser type and operating system, your language preference, and device ID; this category also includes information about how you interact with our Services, such as which pages you visit and how long you stay on them, which links you click, and which pages you visited before and after you visited our Website;

Geolocation with your authorization, information about your location to help you find the nearest branch office or ATM, to determine your zip code, and to prevent fraudulent card use.

Some of the information we process is considered “Nonpublic Personal Information” under GLBA, or “Sensitive Personal Information” under some U.S. State privacy laws. This Policy does not apply to information about you that is publicly available.

If personal information is aggregated or de-identified in a manner that it can no longer be associated with an identified or identifiable person, it is no longer covered by this Policy and may be used for any purpose.

How Does BCU Use Information About Me?

BCU may process information about you, including personal information, for one or more of the purposes described in this Policy. For example, BCU (and/or our service providers) may use information about you to:

- verify consumer identity and review applications for our products and services;
- administer and manage the products and services we provide to our customers, including processing transactions and payments;
- respond to customer support inquiries and communicate with customers about our products and services, offers, and promotions;
- detect and prevent fraud or other crimes, including fulfilling our responsibilities under “Know Your Customer” (KYC) and Anti-Money Laundering (AML) requirements;

- meet our obligations under the GLBA and other applicable laws and regulations, which includes responding to audits, law enforcement requests, or court orders;
- improve our products and services, which includes analyzing how consumers use our Services and developing new products and services to grow our business and improve member experience;
- personalize your Website experience and to deliver content, product and service offerings relevant to your interests, including targeted offers and advertisements through our Website, third-party sites, and via email or text message (with your consent, where required by law).

Does BCU Share the Information It Receives About Me?

BCU may share or disclose information as described below:

Within the BCU Family: We may share personal information internally within BCU and with our affiliates. BCU's personnel may have access to personal information as needed to provide and operate the Services in the normal course of business. Under GLBA, you may opt out of certain information sharing between us and our affiliates. [Our Privacy Notice](#) provides more information about how you may limit sharing.

Third-Party Service Providers: We may share personal information with other companies and individuals we hire to perform functions on our behalf, such as sending mail, analyzing data, responding to customer inquiries, providing marketing assessments, verifying identity, detecting fraud, providing analytics information, processing certain payments, and providing data hosting. They have access to information needed to perform their functions, but not for other purposes.

Business Transfers: If we purchase other businesses or their assets, sell our business assets, or are involved in a merger, acquisition, reorganization, or sale of assets, your information, including any category of personal data collected by BCU, may be among the assets sold or transferred and may be subsequently used by a third-party.

Lawful Requests and Safety: We release personal information when we believe it is required or permitted by applicable law, it is necessary to protect our interests, to prevent fraud or other illegal activity, and to protect the safety of any person. Nothing in this Policy is intended to limit any legal defenses or objections that you

may have to a third party's, including a government's, request to disclose your information.

With your consent: We may share your personal information with additional third parties with your consent. For example, we would share your information with the Zelle payments system if you wanted to add it to your mobile app.

Web Analytics and Tracking

We and our third-party partners use a variety of online tools and technologies to collect information about your use of our Services. This information is used for a number of different purposes, such as to keep our Services secure, to provide a good user experience, to measure how people are using our Services, to improve our Services, and to market our Services. One of the third-party tools we use is Google Analytics, which helps us measure the performance of our online Services and provide us business insights.

Cookies “Cookies” are small text files that get downloaded to your web browser when you visit our Website. Cookies help us give you a good online experience and effectively provide our Services to you. Some of our cookies last for just one visit (“session cookies”), while some remember you over multiple visits (“persistent cookies”). Among other purposes, we and our third-party partners use cookies to: authenticate users visiting our Website, protect our Services from fraud, remember helpful things about our users like their preferred language, track which pages users read, analyze how users interact with our Services, and show users relevant marketing content and advertisements. Your web browser gives you the ability to block and delete cookies. If you block or delete cookies, not all of our Website's features may be fully functional or accessible to you.

Pixels Pixel (also known as tag or web beacon) technology may be used on some of our Services. Pixels are images or small strings of code on our Website that give our third-party partners access to information about how people are using our Services. Pixels help us understand users' likes and interests, enhance their website experiences, and serve more relevant marketing content and advertisements on other websites our users visit.

Your Location Data Our websites and our Mobile Banking app periodically collect, transmit, and use geolocation information to support features such as determining your zip code, finding your nearest Branch or ATM and preventing fraudulent card

use, but only if you authorize collection of such information.

On our websites, you can choose whether geolocation information can be monitored by clicking the “Allow” button when prompted. Using our Mobile Banking app, you may choose whether geolocation information can be followed on a continuous basis in the background, only while the app is being used, or not at all. You can change your location permissions at any time in your device settings.

How Does BCU Secure Information About Me?

We realize that you trust us to protect your personal information. We take that trust seriously and maintain physical, electronic, and procedural safeguards that are consistent with industry standards to help protect the privacy, accuracy, and reliability of personal information and to protect it from loss, misuse, unauthorized access, disclosure, acquisition, exfiltration, alteration, and destruction.

We also take commercially reasonable steps to ensure that our third-party service providers reasonably protect and secure your information. If BCU becomes aware that a third-party service provider is using or disclosing information improperly, we will take necessary and immediate steps to end or correct such improper use or disclosure.

While we attempt to protect the information in our possession and account for the protection of information provided to our third-party service providers through us, no security system is perfect, and we cannot promise that information about you will remain secure in all circumstances. Please do your part to help us keep your information secure. You are responsible for maintaining the confidentiality of your password(s) and your account(s), and for all activities that occur under your account(s). BCU specifically reserves the right to terminate your access to your account(s) and any contract you have with BCU related to the use of the Website in the event it learns or suspects you have disclosed your account or password information to an unauthorized third party.

Data Retention

The types and volume of the personal information we process are adequate, relevant, and reasonably necessary for the Services we provide. We retain records, including personal information, in accordance with BCU’s record preservation and retention policy, as needed to provide our Services or to meet any legally mandated record-keeping or data retention requirements.

Changes to Our Policy

BCU may modify this Policy from time to time. The most current version of this Policy will govern our use of your information. You may contact us to obtain prior versions of this Policy that we have retained in accordance with our document retention policy. We will notify you of material changes to this policy by posting a notice at the Website or by emailing you at an email address associated with your account, if applicable, and provide an “at a glance” overview of any changes.

Contact for More Information

Postal address: Attn: Privacy Requests, 340 N. Milwaukee Ave., Vernon Hills, Illinois 60061.

Email: Privacy.Requests@bcu.org

Phone: 800-388-7000