

TEXELL MOBILE APPLICATION PRIVACY POLICY

Effective as of March 26, 2024

This mobile application privacy policy (the “App Privacy Policy”) applies to the Texell Digital Banking mobile application (the “App”), owned, and operated by Texell Credit Union (“Texell,” “we,” “us,” or “our”). We have created this App Privacy Policy to tell you what information the App collects, how we use that information, and who we will share that information with, if at all. This App Privacy Policy does not address the privacy practices of any third parties that we do not own, control, or are affiliated with. Capitalized terms not defined in this App Privacy Policy will have the meaning set forth in the App’s Terms of Use. This App Privacy Policy only applies to the App. Data that we retain outside of the App is subject to the Texell Privacy Policy, which can be found at texell.org.

The App and its servers are operated in the United States and intended for use by U.S. Residents. By using the App, you agree to these terms and certify that you are a U.S. resident and that you are of legal age in your state of residence. Access to and use of the App is subject to all applicable federal, state, and local laws and regulations. Unauthorized use of the App or unauthorized access to information via the App is strictly prohibited and may result in termination of your access and use of the App. Texell may terminate or suspend all or any part of the Texell Mobile Application at any time, in our discretion, without notice to you, and without liability to you. Texell reserves the right to refuse any transaction for any reason. By visiting and/or using our App, you are agreeing to the terms of this App Privacy Policy and the accompanying Terms of Use. We encourage you to read this App Privacy Policy, and to use the information it contains to help you make informed decisions.

The App does not collect biometrics, browser history, phone or text logs, your contacts, financial information (other than your activity on this App as described elsewhere in this App Privacy Policy), health, medical, or therapy information, or user files on your device that contain your content.

- 1. Information We Collect or Receive.** When you access and operate the App, we will collect and/or receive the following types of information. You authorize us to collect and/or receive such information.
 - (a) Personal Information.** We only receive or collect information that identifies you personally if you choose to provide such personally identifiable information to us via email or other means. When you sign up to become a user or contact us, you will be required to provide us with personal information about yourself (collectively, the “Personal Information”). Such Personal Information may include your name, e-mail address, physical address, phone number, and/or any other identifier that permits physical or online contact with you. We do not collect any Personal Information from you when you use the App unless you provide us with the Personal Information voluntarily.
 - (b) Non-public Information.** Through your interactions with us, such as creating a user account within the App, processing bill payments, applying for a product or service, we may collect non-public information about you such as your Social Security number, tax

identification number, driver's license number, income, Texell user name, Texell password, occupation, or other types of non-public information.

You may request deletion of your user account(s) at any time using the messaging feature within the App or by calling 855.773.1604. Upon deletion of an account, we will delete and direct our service provider to delete this data from our and their respective records as permitted under applicable law, rules, and regulations. Certain data may be retained for security, fraud prevention, or regulatory compliance. Deletion of App data does not delete data related to you or your general banking relationship with us.

- (c) **Payment Information.** If you choose to make a payment or transact a service that requires a fee, you will be required to provide us with your payment information, including, without limitation, bank account numbers, credit card or debit card numbers, account details, ACH information, and similar data (collectively, "Payment Information"). When you use the App to facilitate transfers, we may access your contact list names, email address, and phone numbers. We always ask for your permission before doing this in the App. Such Payment Information will be collected and may be processed by our third-party payment vendors pursuant to the terms and conditions of their privacy policies and terms of use.
- (d) **Files, Documents, and Photos.** In the event you use the remote or mobile deposit feature, the App will use the camera on your device to capture an image of the check and transmit the photos that you submit for deposit. This information will be collected and processed by our third-party vendors pursuant to the terms and conditions of their privacy policies and terms of use.

If you use the secure messaging feature, the App will collect and transmit any files, documents, or attachments that you provide to us or to our third-party vendors. Files, documents, or photos collected and transmitted to our third-party vendors are subject to the terms and conditions of their respective privacy policies and terms of use.
- (e) **Geolocation Information.** Certain features and functionalities of the App are based on your location. In order to provide these features and functionalities while you are using your mobile device, we may, with your consent, automatically collect geolocation information from your mobile device or wireless carrier and/or certain third-party service providers (collectively, "Geolocation Information"). Collection of such Geolocation Information occurs only when the App is running on your device. You may decline to allow us to collect such Geolocation Information, in which case we will not be able to provide certain features or functionalities to you.
- (f) **Third-Party Analytics.** We and the third-party technology providers, with which we work use third-party analytics services (e.g., Google Analytics) to evaluate your use of the App, compile reports on activity, collect demographic data, analyze performance metrics, and collect and evaluate other information relating to the App and mobile and Internet usage to understand your usage of the App and to support advertising. These third parties use cookies and other technologies to help analyze and provide us with the data. You consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this App Privacy Policy. For more information on these third parties, including how to opt out from certain data

collection, please call 855.773.1604. Please be advised that if you opt out of any such service, you may not be able to use the full functionality of the App.

(g) Other Information. In addition to the Personal Information, Non-Public Information, Payment Information, Files, Documents, Photos and Geolocational Information, we may automatically collect or receive additional information regarding you and your use of the App; your interactions with us and our advertising; and information regarding your computer and mobile devices used to access the App (collectively, the “Other Information”) in order to understand your usage of the App, improve the functionality of the App and to support advertising. Such Other Information may include:

(i) **From You.** Additional information about yourself that you voluntarily provide to us, such as your gender and your product and service preferences.

(ii) **From Your Activity.** We may collect or receive information regarding:

(A) IP address, which may consist of a static or dynamic IP address and will sometimes point to a specific identifiable computer or mobile device;

(B) browser type and language;

(C) referring and exit pages and URLs;

(D) date and time; and

(E) details regarding your activity on the App, such as search queries and other performance and usage data.

(iii) **About Your Mobile Device.** We may collect or receive information regarding:

(A) type of mobile device;

(B) advertising Identifier (“IDFA” or “AdID”);

(C) operating system and version (e.g., iOS, Android, or Windows);

(D) carrier; and

(E) network type (e.g., Wi-Fi, 3G, 4G, 5G or LTE).

(iv) **From Cookies.** We may use both session cookies, which expire once you close the App, and persistent cookies, which stay on your mobile device until you delete them and other technologies to help us collect data and to enhance your experience with the App. Cookies are small text files an app can use to recognize a repeat visitor to the app. We do not use or associate personally identifiable information with cookies, and cookies do not reveal personal information. Cookies are enabled by default in order to optimize website functionality and the user experience.

We also use cookies for various administrative purposes such as gathering data about the use of the App, monitoring promotions, and to help us to inform you about additional products, services, or promotions that may be of interest to you.

We may use cookies for various purposes, including without limitation, to:

(A) identify your type of mobile device;

- (B) personalize your experience;
- (C) analyze which portions of the App are visited and used most frequently; and
- (D) measure and optimize advertising and promotional effectiveness.

If you do not want us to deploy cookies in the App, you can opt out by setting your mobile device to reject cookies. You can still use the App if you choose to disable cookies, although your ability to use some of the features may be affected.

2. Information Collected by Or Through Third-Party Advertising Companies. We may share Other Information about your activity on the App with trusted third parties for ad distribution and ad optimization. These third parties may use cookies, pixel tags (also called web beacons or clear gifs), and/or other technologies to collect Other Information for such purposes. Pixel tags enable us and these third-party advertising companies to recognize a browser's cookie when a browser visits the site on which the pixel tag is located in order to learn which advertisement brings a user to a given site. In addition, we may receive Other Information from advertisers and/or their service providers such as advertising identifiers, IP addresses, user activity, and post-conversion data.

3. How Information Is Used and Shared.

- (a) You authorize us to use the Personal Information, Non-Public Information, Payment Information, Files, Documents, Photos, Geolocation Information, and the Other Information (collectively, the "Information") to:
 - (i) provide and improve our App;
 - (ii) provide our services;
 - (iii) administer our promotional programs;
 - (iv) detect and prevent fraud;
 - (v) solicit your feedback; and
 - (vi) inform you about our products and services.
- (b) We engage third-party companies and individuals to perform functions on our behalf. Examples may include providing technical assistance, customer service, marketing assistance, and administration of promotional programs. In order to provide our services, these third-party companies will have access to the Information only as necessary to perform their functions and are contractually obligated to keep the Information secure.
- (c) We will use your Payment Information to process your authorized payments through the App. We may share your Payment Information with a third-party service provider as necessary to process your payment. If your payment is processed by a third-party service provider, the provider stores your Payment Information; we do not store this information. Storage by any third-party service provider of your Payment Information is subject to the privacy policies and practices of the third-party service provider and is not subject to the terms of this App Privacy Policy. By providing your Payment

Information, you acknowledge and agree to use of such information by the third-party service provider for purposes of processing your payment to us.

- (d) To the extent permitted by law, we may also disclose the Information:
 - (i) when required by law, court order, or other government or law enforcement authority or regulatory agency; or
 - (ii) whenever we believe that disclosing such Information is necessary or advisable, for example, to protect the rights, property, or safety of us or others, including you.
- (e) In an ongoing effort to better understand our users and improve the App and our products and services, we may analyze aggregated and de-identified data which does not identify individual account holders. We may share and/or license this aggregate data to our affiliates, agents, business and promotional partners, and other trusted third parties. We may also disclose aggregated user statistics to describe the App and these products and services to current and prospective business partners and investors and to other third parties for other lawful purposes.
- (f) We may share some or all your Information with any of our subsidiaries. We will retain your information for as long as reasonably necessary for the purposes described above.

- 4. Accessing and Modifying Information and Communication Preferences.** If you have provided us with any Personal Information, you may access, remove, review, and/or make changes to the same by contacting us as set forth below. In addition, you may manage your receipt of marketing and non-transactional communications by clicking on the “unsubscribe” link located on the bottom of any of our marketing e-mails. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information from within our databases. You cannot opt out of receiving transactional e-mails related to the App (e.g., requests for support).

We may also deliver notifications to your mobile device (e.g., push notifications). You can disable these notifications by deleting the relevant service or by changing the settings on your mobile device.

- 5. How We Protect Your Information.** We take commercially reasonable steps to protect the Information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. We restrict access to the personal information obtained from our App to only those employees, agents and contractors who need it to do their jobs. We maintain administrative, technical, and physical safeguards designed to protect your personal information. Additionally, companies that provide online services on our behalf are required by contract to protect customer information. They are only allowed to use the information they collect for the purpose of providing the services that we have contracted to them. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases or the databases of the third parties with which we may share such Information, nor can we guarantee that the Information you supply will not be intercepted while being

transmitted over the Internet. In particular, e-mail sent to us may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail.

6. Important Notices to Non-U.S. Residents and Usage Outside of the United States. This App is operated in and intended for use in the United States. If you are located outside of the United States, please be aware that your Information, including your Personal Information, may be transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to use the App, you irrevocably and unconditionally consent to the transfer, processing, storage, and use of your information in the United States and other jurisdictions.

7. App Stores; External Websites. Your app store (e.g., iTunes or Google Play) may collect certain information in connection with your use of the App, such as Personal Information, Non-Public Information, Payment Information, Geolocational Information, and other usage-based data. We have no control over the collection of such information by a third-party app store, and any such collection or use will be subject to that third party's applicable privacy policies.

The App may contain links to third-party websites. We have no control over the privacy practices or the content of these websites. As such, we are not responsible for the content or the privacy policies of those third-party websites. You should check the applicable third-party privacy policy and terms of use when visiting any other websites.

8. Children. The App is not directed to children under the age of 13. We adhere to the Children's Online Privacy Protection Act (COPPA) and will not knowingly collect Personal Information from any child under the age of 13. We ask that minors (under the age of 13) not use the App. If a child under the age of 13 has provided us with Personal Information, a parent or guardian of that child may contact us and request that such information be deleted from our records.

9. California Privacy Rights: Shine the Light Law. Under California Civil Code Section 1798.83, California residents who have an established business relationship with us may choose to opt out of our sharing their contact information with trusted third parties for direct marketing purposes. If you are a California resident and you wish to opt out, please send an e-mail to services@texell.org.

10. California Privacy Law: Do Not Track. We do not monitor, recognize, or honor any opt-out or do not track mechanisms, including general web browser "Do Not Track" settings and/or signals.

11. Changes to This App Privacy Policy. This App Privacy Policy is effective as of the date stated at the top of this App Privacy Policy. Texell may in its sole discretion modify the terms of this App Privacy Policy from time to time. Any such changes will be posted on the

App. By accessing the App after we make any such changes to this App Privacy Policy, you are deemed to have accepted such changes. Please be aware that, to the extent permitted by applicable law, our use of the Information is governed by the App Privacy Policy in effect at the time we collect the Information. Please refer back to this App Privacy Policy on a regular basis.

12. How to Contact Us. If you have questions about this Privacy Policy, please e-mail us at services@texell.org with “App Privacy Policy” in the subject line or mail us at the following address: PO Box 983, Temple, Texas 76503.