ORNL FEDERAL CREDIT UNION’S ONLINE PRIVACY NOTICE

This Online Privacy Notice (“Notice”) applies to this ORNL Federal Credit Union online interface (i.e. website or mobile application) and any online interface that links to the Notice. ORNL Federal Credit Union is committed to protecting your personal and financial information provided to us at all times. This Notice describes how information is collected by and through ORNL Federal Credit Union’s website(s), mobile application(s), and other online interfaces, (collectively, our “Sites”) including the information gathered from our website at https://www.ornlfcu.com, and how that information may be used or shared. For purposes of this Notice, the terms “we”, “us”, and “our” refer to ORNL Federal Credit Union. The terms “you”, “your” and “yours” refer to any natural person who accesses or uses our Sites for personal, family, or household purposes. By using or accessing our Sites, you confirm your agreement to the terms of this Notice as may be in effect at that time.

Protecting Children’s Privacy Online

ORNL Federal Credit Union’s Sites are not directed to individuals under the age of thirteen (13), and we request that these individuals not provide Personal Information through the Sites. We do not knowingly collect information from children under 13 without parental consent. Visit the Federal Trade Commission website for more information about the Children's Online Privacy Protection Act (COPPA).

User Consent

By accessing or otherwise using https://www.ornlfcu.com, as well as any mobile application or interface, you agree to the terms and conditions of this Privacy Notice and the associated Terms of Service. You expressly consent to the collection, usage and processing of your Personal Information and Anonymous Information according to this Privacy Notice. Personal Information means any information that we collect or use by or through our Sites that identifies you personally, and “Anonymous Information” means information that we collect or use by or through our Sites that does not identify you personally or contain personal identifiers about you. Examples of Personal Information include your name, telephone number and address. Examples of Anonymous Information include information about your mobile device, your web browser, and your operating system.

How We Collect and Use Anonymous Information

We and our third-party service providers may collect and use Anonymous Information in a variety of ways, including the following:

We use web analytics tools to collect Anonymous Information about pages visited, links that are clicked, and other information about the use of our website. We use this
information in the aggregate to better understand consumer activity, and to improve Credit Union products and services.

Certain information is collected by most browsers and/or through your device, such as your Internet Protocol Address (IP Address), Media Access Control (MAC) address, device type, screen resolution, operating system version and internet browser type and version. We use this information to ensure that our Sites function properly on computers and/or personal devices, for fraud detection and prevention, and for security purposes.

Cookies are pieces of information stored directly on the device you are using. Cookies allow us to collect information such as browser type, time spent on the website, pages visited, language preferences, and your relationship with the Credit Union. We use the information for security purposes, to facilitate navigation, to display information more effectively, to personalize your experience while engaging with us, and to recognize your device which allows secure use of our online products and services. We collect statistical information about the usage of our Sites in order to continually improve their design and functionality, to monitor responses to Credit Union advertisements and content, to understand how Members and visitors interact with them and to assist us with resolving questions regarding the website.

Web browsers can alert you when cookies are placed on your computer or mobile device or to prevent them from being placed. However, if you choose to prevent cookies from being placed on your computer or mobile device, some of our Online Banking functions may not work properly.

We may also use the information collected for internal statistical purposes or to send you communications about products and services you have requested or may have indicated potential interest.

**How We Collect and Use Personal Information**

If you are simply browsing through our website, we do not request any Personal Information, nor do we collect uniquely identifying information unless you voluntarily and knowingly provide us the information, such as when you send the Credit Union an email, provide feedback about our products and services, complete a survey, or complete an application online. If you provide us this information, it is only used internally and in furtherance of the purpose for which it was provided. As noted above, Personal Information means personally-identifiable information such as information you provide via forms, applications and/or other online fields including name, addresses, telephone and mobile numbers, or account numbers. To the extent that any such information that you provide is “nonpublic personal information” as defined and described by Title V of the Gramm-Leach-Bliley Act, 15 U.S.C. § 6809, said Act shall control and supersede this Notice.

As part of providing online financial products and/or services, we may obtain Personal Information about our Members and website visitors from various sources, including:

- Information we receive from you on applications, emails, or other forms;
- Information about your transactions with us and our affiliates;
- Information we receive from a consumer-reporting agency; and
• Information that is generated electronically when you visit our website or use our online financial services.

We may use Personal Information in the following ways:

• To respond to your inquiries and requests, and to send you notifications.
• To send administrative information to you, such as information regarding the Site and changes to our terms, conditions and policies.
• To complete and fulfill your applications for our products and services and to deliver and perform such products and services, to execute inquiries and transactions you have requested, to communicate with you regarding products and services you have obtained from us, and to provide you with related customer service.
• To verify your identity or location for security purposes.
• To send you marketing communications that we believe may be of interest to you.
• To personalize your experience on the Site by presenting products and offers tailored to you.
• As you agree, authorize, or consent in agreements, terms, and conditions you agree to or accept in connection with products and services you obtain from us.
• For our business purposes, including (but not limited to) such purposes as (i) data analysis, (ii) audits, (iii) fraud monitoring and prevention, (iv) new product development, (v) enhancing, improving or modifying our products and services, (vi) identifying usage trends, (vii) determining the effectiveness of our promotional campaigns, and (viii) operating and expanding our business activities.
• As we believe to be necessary or appropriate (i) under applicable law, (ii) to comply with legal process and otherwise to comply with applicable laws, rules, and regulations, (iii) to respond to lawful requests from public and government authorities, (iv) to enforce our terms and conditions, (v) to protect our operations or those of any of our affiliates, (vi) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others, and (vii) to allow us to pursue available remedies or limit the damages that we may sustain.

Other Uses of Information Collected

We may disclose the information that we collect, as described above, with third-party Service Providers acting on our behalf to provide online financial services such as Online Banking and Bill Payment. We may also use the information collected in connection with our online advertising, which may take the form of banners or pop-up ads.

We may disclose information when required or permitted by law. For example information may be disclosed in connection with a subpoena or similar legal process, fraud prevention, or security investigation. In addition, we may disclose information in the following circumstances:

• To allow you to utilize features within our Site by granting us access to information from your device(s) such as contact lists or geo-location when you request certain services.
• For risk control, fraud detection and prevention, to comply with laws and regulations; and to comply with other legal process and law enforcement requirements;

We may share information outside of the Credit Union when we have your consent, such as when you request a specific product like insurance or an investment product from a third-party financial services provider.

We may disclose aggregate (i.e., not personally identifiable) information with Service Providers or financial institutions that perform marketing and research services on our behalf and with whom we have joint marketing agreements. Our contracts require all such Service Providers/or financial institutions to protect the confidentiality of your information to the same extent that we are required to do so.

We may request your participation in surveys and other forms of market research, contests and similar promotions and to administer these activities. Some of these activities may have additional rules, including the use and sharing of Personal Information.

We do not disclose any information about our current Members, former Members, and/or website visitors to anyone, except as permitted or required by law. We do not sell any of your Personal Information.

**How Personal Information is Shared**

Please see our Privacy Notice below for information on how Personal Information may be shared and how you may be able to limit certain types of sharing.

**Links to Other Websites**

For your convenience, we may provide links to third-party sites. If you follow links to websites not affiliated or controlled by the Credit Union, you should review the privacy and security policies and other terms and conditions, as theirs may be different from ours. We do not guarantee and are not responsible for the privacy or security of these sites, including the accuracy, completeness, or reliability of their information. ORNL Federal Credit Union is not responsible for the content of linked sites and does not represent either the third party or you, the Member, if you enter into a transaction.

**Social Media**

ORNL FCU provides experiences on social media platforms including, but not limited to, Facebook®, Twitter®, YouTube®, Instagram®, LinkedIn®, Google+®, and Pinterest® that enable online sharing and collaboration among users who have registered to use them. Any content you post on official ORNL Federal Credit Union-managed social media pages, such as pictures, information, opinions, or any Personal Information that you make available to other participants on these social platforms, is subject to the Terms of Use and Privacy Policies of those respective platforms. Please refer to the service providers to better understand your rights and obligations with regard to such content. In addition, please note that when visiting any official ORNL FCU social media pages, you are also subject to our Privacy Notice. As such, we may collect information from our interactions with you at such social media
outlets and applications and we may then use the collected information for the purposes described in this Notice.

**Email Policies**

When you enroll for our online services and/or opt-in for Credit Union communications, we may send you a confirmation email. We may also send emails marketing various products and services offered by the Credit Union or its affiliates. We always provide you with an opportunity to opt-out of these marketing-related emails.

We will also send security-related email notices when you sign-up for email (“notify me”) alerts on your account(s) or whenever you change your password, security question(s), or email address.

If you agree to accept electronic disclosures and/or online account e-statements, we may also send you notices of important account updates through email. For example, if you have agreed to accept disclosures electronically, we may send you an email with updates to this privacy policy and/or we may send you a notice that your account statement is available for viewing on our website. For more information on how to enroll for electronic disclosures, please contact us at 1-800-676-5328.

**Security**

To protect Personal Information from unauthorized access and use, we use security measures that comply with applicable law and regulations. ORNL FCU and our Service Providers have developed strict policies and procedures to safeguard your Member Information. Our policies require confidential treatment of your personal information. We have established training programs to educate our employees about the importance of Member privacy and to help ensure compliance with our policy requirements. Furthermore, ORNL FCU and our Service Providers maintain strong physical, electronic and procedural controls to protect against unauthorized access to Member information.

**Updates to this Privacy Notice**

This Privacy Notice is subject to change. Please review it periodically. If we make changes to this Privacy Notice, we will revise the “Last Updated” date at the bottom of this Notice. Any changes to this Notice will become effective when we post the revised Notice on the website. Your use of the website following these changes means that you accept the revised Notice.

**Questions**

If you have any questions about our privacy policy or concerns about our privacy practices, please contact us at 865-688-9555, 1-800-676-5328 or group-compliance@ornlfcu.com.
**PRIVACY NOTICE**

**FACTS**

**WHAT DOES ORNL FEDERAL CREDIT UNION DO WITH YOUR PERSONAL INFORMATION?**

**Why?**
Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we can do.

**What?**
The types of personal information we collect and share depend on the product or service you have with us. This information can include:
- Social Security number and income
- Account balances and payment history
- Credit history and credit scores

**How?**
All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons we choose to share; and whether you can limit this sharing.

<table>
<thead>
<tr>
<th>Reasons we can share your personal information</th>
<th>Does ORNL Federal Credit Union share?</th>
<th>Can you limit this sharing?</th>
</tr>
</thead>
<tbody>
<tr>
<td>For our everyday business purposes - such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>For our marketing purposes - to offer our products and services to you</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>For joint marketing with other financial companies</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>For our affiliates’ everyday business purposes - information about your transactions and experiences</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>For our affiliates’ everyday business purposes - information about your creditworthiness</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>For our affiliates to market to you</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>For non-affiliates to market to you</td>
<td>No</td>
<td>We don’t share</td>
</tr>
</tbody>
</table>

**To limit our sharing**
- Call (865) 688-9555 or (800) 676-5328
- By email: group-compliance@ornlfcu.com, or
- Mail the form below

**Please note:**
If you are a new member, we can begin sharing your information [30] days from the date we sent this notice. When you are no longer our member, we will not continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

**Questions?**
Call (865) 688-9555 or (800) 676-5328 or go to ornlfcu.com

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**Mail-in Form**

If you have a joint account, your choice(s) will apply to everyone on your account.

Mark any/all you want to limit:
- Do not share information about my creditworthiness with your affiliates for their everyday business purposes.
- Do not allow your affiliates to use my personal information to market to me.

<table>
<thead>
<tr>
<th>Member Name:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Address:</td>
<td></td>
</tr>
<tr>
<td>City, State, Zip:</td>
<td></td>
</tr>
<tr>
<td>Account #:</td>
<td></td>
</tr>
</tbody>
</table>

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### Who we are

| Who is providing this notice? | ORNL Federal Credit Union |

### What we do

| How does ORNL Federal Credit Union protect my personal information? | To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. |
| How does ORNL Federal Credit Union collect my personal information? | We collect your personal information, for example, when you:  
- Apply for an account or Apply for a loan  
- Provide your employment information or employment history  
- Provide your driver's license  
We also collect your personal information from others, such as credit bureaus, affiliates, or other companies. |
| Why can’t I limit all sharing? | Federal law gives you the right to limit only:  
- Sharing for affiliates’ everyday business purposes—information about your creditworthiness  
- Affiliates from using your information to market to you  
- Sharing for non-affiliates to market to you  
State laws and individual companies may give you additional rights to limit sharing. |
| What happens when I limit sharing for an account I hold jointly with someone else? | Your choice will apply to everyone on your account |

### Definitions

| Affiliates | Companies related by common ownership or control. They can be financial and non-financial companies. Our affiliates are:  
- CU Community, L.L.C. Group of Companies, including CU Community Mortgage; and CU Community Title; and Credit Union Insurance Services |
| Non-affiliates | Companies not related by common ownership or control. They can be financial and non-financial companies.  
- We do not share with non-affiliated companies |
| Joint marketing | A formal agreement between non-affiliated financial companies that together market financial products or services to you. These include:  
- Insurance Companies  
- Direct Marketing Companies |