

# **ProFed Online Privacy Practices**

Last Updated November 2025

ProFed Federal Credit Union (ProFed) understands the importance of privacy when you visit our website or use ProFed Online Banking, our Internet Banking service. For this reason, we have developed the following privacy statement explaining how we collect, use, and protect confidential information. For purposes of this notice, non-public personal information (NPI) means information that identifies you or your accounts and is not publicly available, such as account numbers, balances, transaction history, contact information, and information provided in applications. For information about cookies and online tracking technologies, please see our **Cookie Policy**.

## **OUR COLLECTION OF INFORMATION**

We collect information from you only where we feel it will assist us in providing you with superior service and quality products. Additionally, we may compile statistics regarding geographical data, what pages are visited, time spent on the site, browser and Internet service provider types, and other information that we may use to improve our website.

Within ProFed Online Banking, we may collect additional information needed to operate the service securely and process your requests. This may include login-related information, transaction information, external account information used for transfers, and account-service activity such as bill payment details, scheduled or recurring payments, transfer requests, remote deposit activity, and credit-related servicing information.

If you use our mobile app, we may collect device-specific information necessary to operate the app, such as mobile operating system, device settings, and security identifiers.

If you enroll in optional services, such as credit score monitoring, we may receive basic information about your enrollment and activity so the service can function properly. This may include general score updates or alerts needed to provide the feature you requested.

We may review general activity within online banking, such as when an application or request is started or completed, to ensure our systems function smoothly and to understand product performance and member use. We may also use aggregated analytics to understand overall interest in our products and to help plan credit union-wide promotions or educational campaigns.

If you send us an email, we may save your email address, the message, and our reply. If you use our text or chat services, we may save your correspondence and our replies. Some of our programs and applications may also collect general technical details, such as your geolocation, device type, phone number, IP address, and session information, to aid in security and to provide you with appropriate services. We may use any information collected as a reference for other questions, to track any problems with your account, or to ensure we are providing quality member service. We work to maintain the accuracy of member information and encourage you to notify us promptly if any of your contact or account details change.

## **USE OF INFORMATION**

ProFed will not provide or sell your non-public personal information to any private party for independent use. We will only share personal information with non-affiliated companies under one of the following circumstances: you have authorized its sharing; you have requested or initiated a transaction requiring it; we are reporting your information to a credit reporting agency; or we are required or permitted by law to disclose the information.

Your information may be shared with ProFed's affiliated companies for the purpose of providing you with special products or services. For example, we contract with other companies for ProFed Online Banking and Bill Payment services that require the use of certain information solely to perform services on our behalf. These companies have agreed not to share any of this information with any third party.

We may also share limited technical data with service providers that help us operate our website, evaluate site activity, or measure the effectiveness of our online communications. This does not include non-public information (NPI) as defined by GLBA.

We retain information only as long as necessary to provide services, comply with legal requirements, and maintain accurate business records. When information is no longer needed, we dispose of it safely and securely in accordance with federal and state requirements and industry best practices.

## SECURITY MEASURES FOR TRANSMISSION OF INFORMATION

ProFed Online Banking uses a multi-layered security system. Each security level governs a unique aspect of the member's session and transactions with the credit union. By implementing both software and hardware solutions, this security forms a system that enables members to conduct business with the credit union via the Internet with a high degree of security. Our security consists of:

- · Data Source Security
- · Data Transmission Security
- · Account Protection Security

## **DATA SOURCE SECURITY**

ProFed's database cannot be directly accessed via the Internet. Appropriate security measures, such as firewalls, logs, and monitoring, are in place to guard against unauthorized activity.

## **DATA TRANSMISSION SECURITY**

All transmissions via the Internet between the user and the credit union are protected by Secure Socket Layer (SSL) encryption. SSL utilizes authentication and encryption technology developed by RSA Data Security, Inc. for secure internet communication. This method of cryptography (also known as Public Key Encryption) provides for:

- Server Authentication (stopping impostors)
- Privacy using Encryption\* (stopping eavesdroppers)
- Data Integrity (stopping tampering)

\*Encryption is the process of taking valid data and scrambling it into a meaningless combination of numbers and letters. The scrambled or encrypted data is then transmitted across the Internet to our secure site, where the data is unscrambled or decrypted.

Specifically, we are using public key encryption. This encryption technique creates a pair of asymmetric keys for encryption and decryption. One is called the public key, and the other is called the private key. When data is encrypted using the public key, it can only be decrypted using the private key. Conversely, when data is encrypted using the private key, it can only be decrypted using the public key.

## **ACCOUNT PROTECTION SECURITY**

Account protection security utilizes multifactor authentication through a knowledge-based challenge (a password) and a possession-based challenge (one-time access code sent via text or voice message to the phone number previously registered with the credit union).

Login: At first login, users will be required to select a username that cannot be the same as the account number.

- The username is required to be at least six characters and cannot be all numbers.
- The username can contain letters, numbers, or the special characters: @\$\_-+.!~

Password: Users will be required to select a password at least six characters long.

- The password must contain characters from at least two of the following categories: letters, numbers, and special characters.
- The password cannot be part of the username.
- · Passwords are case sensitive.

When logging in for the first time from an unrecognized device, users will be required to enter a one-time access code sent via text or voice message to the phone number previously registered with the credit union.

Users may elect to register a device or a trusted computer to bypass the one-time-based access code in the future.

By choosing this option, the system will tag the user's machine with a device identifier and will record a fingerprint of the user's system for security purposes.

## **INACTIVITY**

For security, inactive user sessions will automatically terminate after ten minutes. A timeout warning message will appear approximately one minute before the session times out to allow the user to renew the session for another ten minutes.

## **SECURITY MEASURES AFTER RECEIPT OF INFORMATION**

Any data or statistics that ProFed gathers from its website or ProFed Online Banking site are kept in strict confidentiality. Only certain employees have access to this information, and employees may only view the data for legitimate business purposes. The same restrictions apply to all of ProFed's affiliated companies.

#### **CHILDREN'S ONLINE PRIVACY**

ProFed complies with the Children's Online Privacy Protection Act (COPPA) to protect children's privacy online. COPPA requires us to inform parents or legal guardians how we collect, use, and disclose personal information from children who are under 13 years of age. Children can view activities, links, games, and stories while on ProFed's website without any personal information being collected. We do not collect personal information from children unless they register as an online account user and provide an email address. We do not purposefully market to children. Parents, please be aware that by allowing your child to have an online account, you are consenting to your child viewing our normal marketing messages, which may display to all accounts. For more information about our privacy policies, please contact 260-483-0514 ext. 1633.

## **CONTACT INFORMATION**

If you have any problems or questions about our privacy practices or ProFed Online Banking, please contact us by email at **contactus@profedcu.org**. You will receive a reply within one business day. You may also reach us by U.S. mail at: ProFed Federal Credit Union, 1710 St. Joe River Drive, P.O. Box 5466, Fort Wayne, IN 46895-5466.

