



## **SMSE Federal Credit Union Mobile and Online Banking Privacy Policy**

**Effective Date:** June 9, 2026

SMSE Federal Credit Union ("SMSE," "we," "our," or "us") is committed to protecting the privacy and security of our members' personal and financial information. This Privacy Policy describes how information is collected, used, disclosed, and protected when you use our Online Banking services, Mobile Banking Application ("App"), and related services.

By using our Online Banking services or Mobile Banking App, you consent to the practices described in this Privacy Policy.

### **Information We Collect**

We may collect the following information when you enroll in or use Online Banking or the Mobile Banking App:

- Personal information, including your name, address, phone number, email address, date of birth, account number, and login credentials.
- Account and transaction information.
- Device information, including IP address, device type, operating system, browser type, and application usage data.
- Location information, when authorized by you, to help locate branches and ATMs and assist with fraud prevention.
- Check images and related information when using Mobile Deposit services.
- Security, diagnostic, and performance information necessary to maintain and improve our services.

If you choose to use biometric authentication (such as fingerprint or facial recognition), the biometric information remains stored on your device and is not collected or retained by SMSE Federal Credit Union.

## **How We Use Information**

We use your information to:

- Provide and maintain Online and Mobile Banking services.
- Authenticate users and prevent unauthorized access
- Process transactions, transfers, and mobile deposits.
- Verify your identity and secure your accounts.
- Detect and prevent fraud, unauthorized access, and other security risks.
- Communicate important account and service information.
- Improve products, services, and member experience.
- Comply with applicable laws, regulations, and legal requirements.

## **Mobile Application**

When you use the Mobile Banking App, we may automatically collect:

- Device type and model, Operating system version, Mobile device identifiers, IP address  
Browser type, App usage information, and Diagnostic and performance data.

## **Biometric Information**

If enabled by you, the App may allow login using biometric authentication features such as:

- Fingerprint recognition
- Facial recognition

Biometric information is processed and stored by your device manufacturer (Apple or Google) and is not collected or stored by SMSE Federal Credit Union.

## **Safeguarding Personal Information**

SMSE Federal Credit Union maintains a comprehensive information security program designed to protect your personal and financial information from unauthorized access, use, disclosure, alteration, or destruction.

Our safeguards include:

- Data encryption during transmission and storage where appropriate.
- Secure authentication and access controls.
- Ongoing network and system monitoring.
- Employee training on privacy and information security practices.
- Physical, technical, and administrative safeguards consistent with applicable federal regulations and industry standards.

Access to member information is restricted to authorized personnel who require such access to perform their job responsibilities.

## **Information Sharing**

SMSE Federal Credit Union does not sell member information.

We may share information with trusted third-party service providers that support our operations, including payment processing, mobile banking services, fraud monitoring, and account servicing. These providers are required to maintain the confidentiality and security of member information.

We may also disclose information as permitted or required by law, regulation, court order, or to protect the rights, property, and safety of SMSE Federal Credit Union, our members, and others.

### **Service Providers**

Third-party vendors that assist us in providing banking services, including:

- Core processing providers
- Mobile banking platform providers
- Payment processors
- Fraud detection and prevention providers
- Check imaging and deposit processing providers

These providers are contractually required to protect your information and use it only for authorized business purposes.

### **Legal and Regulatory Requirements**

We may disclose information when required by law, including:

- Court orders
- Subpoenas
- Regulatory examinations
- Law enforcement investigations
- Compliance with federal and state regulations

These providers are contractually required to protect your information and use it only for authorized business purposes.

## **Information Retention**

We retain information as necessary to provide services, maintain business records, comply with legal and regulatory requirements, and resolve disputes. We will retain and use your Personal Information to the extent necessary to comply with our legal obligations (for example, if we are

required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We will also retain Other Information for internal analysis purposes. Other Information is generally retained for a shorter period of time, except when used to strengthen the security or to improve the functionality of our Sites, or we are legally obligated to retain this data for longer time periods.

## **Data Security**

SMSE Federal Credit Union employs administrative, technical, and physical safeguards designed to protect your information, including:

- Encryption of sensitive data
- Secure transmission protocols
- Multi-factor authentication where available
- Continuous monitoring for unauthorized access
- Restricted employee access to confidential information

While we use commercially reasonable measures to protect your information, no method of transmission or storage can be guaranteed to be 100% secure.

## **Children's Privacy**

Our Online Banking and Mobile Banking services are not intended for children under the age of 13, and we do not knowingly collect personal information from children without appropriate consent.

## **Policy Updates**

SMSE Federal Credit Union may update this Privacy Policy periodically. Any changes will be posted through our website, Online Banking platform, or Mobile Banking application.

We reserve the right to update this Privacy Policy at any time to address future developments or changes in industry or legal trends. We will post the revised Policy on our Sites or announce the change on our homepage. If we make changes to this Policy, we will revise the "Effective Date" section above. Any changes to this Policy will become effective upon the posting of the revised Policy on our Sites. By continuing to use our Sites following such changes, you will be deemed to have agreed to such changes. If you do not agree with the terms of this Policy, as it may be amended from time to time, in whole or in part, please do not continue using our sites.

## **Interruption of Service**

At certain times, our Sites or our other electronic services may not be available due to system maintenance or circumstances beyond our control. We do our best to schedule maintenance at times of least member impact and do our best to notify you prior to maintenance.

## **Contact Information Regarding Our Privacy Practices**

If you have questions or require additional information regarding our privacy practices, please contact us at 248-557-2266 or visit us at your local branch during business hours.