

## Privacy Policy

### Important Privacy Choices for Consumers

You have the right to control whether we share some of your personal information. Please read the following information carefully before making your choices.

### Your Rights

You have the right to restrict the sharing of personal and financial information with our affiliates (companies we own or control) and outside companies that we do business with. This includes sending you information about other products or services. You may not limit the sharing of your personal and financial information for our everyday business purposes or as required by law.

### Your Choices

To read our Privacy Notice, [click here](#).

To limit the use of your ESL Information, complete our [Privacy Opt Out Election form](#) and mail the form to us.

If you have already completed the Privacy Opt Out Election form, you don't need to complete another one. Your preferences will remain the same until you tell us otherwise.

## Credit Union Members

### Online Security Practices

ESL Federal Credit Union recognizes the importance of maintaining a presence on the World Wide Web for informational and e-commerce purposes in both attracting new members and retaining existing members. For the purpose of this statement, online activity is defined as the ability of members to access personal account information and general credit union information, to initiate transactions on your credit union accounts, and to apply for additional credit union products and services online. Our privacy policy is the same whether you are online or not.

### Information We Gather Online

We may gather information about which pages of our site our visitors browse. This enables us to track how a visitor navigates through the site areas in which they show interest. We gather information such as number of hits to the site, page visits, and length of user sessions. This is similar to a traffic report: it tracks trends and behaviors of members/users in general, but does not identify individuals in particular. We use this information to better serve you and it helps keep our site relevant and useful by helping us understand what information users want.

### Our Use of Cookies

Cookies are small text files sent by a web server to your PC where they are stored for a limited amount of time. Cookies help websites recognize return visitors. So, when you return to a website that you have visited before, your browser gives this data back to the server. ESL uses cookies to make your online experience easier and more personalized. We use cookies in the following ways:

- Online banking places a cookie on your PC when you log in. It is a temporary cookie that holds a unique number that identifies you only to our server. It holds no personal information and is deleted when you exit online banking.

- The Enhanced Login Security feature of online banking also places a cookie on your computer if you choose to enroll a specific computer. This cookie contains no personal data; however, the cookie does have a personalized credential that, in combination with your member number and password, authenticates you to online banking. If the cookie is not present, you will be asked to validate Validation Questions to enter online banking.
- The Invest & Plan tab of our website also uses a cookie. This cookie identifies you to our server to determine whether or not you have been shown our Investment Disclosure. This cookie expires after one year and holds no personal information.
- Various pages on our website place cookies on your PC when you visit those pages. The purpose of those cookies is to track activity and usage patterns on the site. These cookies are not personally identifiable.
- ESL Online Chat places a cookie on your PC when you use chat banking. When using the ESL Online Chat feature from our general website, this cookie allows our system to pre-fill the chat form with the name you used if you previously connected to the chat service. This provides our Internet Specialists with any history of previous conversations you may have had with us through ESL Online Chat. If using chat banking while inside online banking, this cookie does allow us to identify who you are and also tells us what relationships you have with us. We have the ability to co-browse with you during the chat session which gives us the ability to view the pages you are viewing. During a co-browse chat session, we are unable to enter information into any online forms or change your settings in any way. We also cannot see information which you are entering on an online form. Once you close your chat session, the ability to co-browse is disabled.

### **Links to Other Non-ESL Websites**

ESL does offer links on our website to other vendors and third parties. These links are given to you to provide opportunity for you to take advantage of their products or services. ESL cannot guarantee how these third parties collect or use personally identifiable information about you. We urge you to review the privacy policies of each of the linked websites you visit. When you visit these third party sites you will no longer be subject to, or under the protection of, the privacy and security policies of ESL Federal Credit Union. ESL is not responsible for the content of these third party websites. ESL does not represent either the third party or the member if the two enter into a transaction.

### **Third-Party Site Disclaimer**

For your convenience esl.org provides a variety of information on our web site that is not directly related to ESL products or services. This information is provided through the use of third party service providers via web links.

By accessing these links you will be leaving ESL Federal Credit Union's web site and entering a web site hosted by another party. ESL is not responsible for the content of this third party web site. ESL does not represent either the third party or the member if the two enter into a transaction.

Please be advised that you will no longer be subject to, or under the protection of, the privacy and security policies of ESL Federal Credit Union. You are encouraged to review the privacy and security policies of the site you are entering, which may be different than those of ESL.



FACTS

WHAT DOES ESL 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 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 member’s personal information to run their everyday business. In the section below, we list the reasons financial companies can share their member’s personal information; the reasons ESL chooses to share; and whether you can limit this sharing.

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

To limit our sharing

- Call 585.336.1000 or 800.848.2265;
- Visit us online: [esl.org](http://esl.org);
- Mail the form below; **or**
- Visit your local branch

**Please Note:**

If you are a *new* member, we can begin sharing your information 30 days from the date we sent you this notice. When you are *no longer* our member, we continue to share your information as described in this notice.

However, you can contact us at any time to limit our sharing.

Questions?

Call 585.336.1000 or 800.848.2265, go to [esl.org](http://esl.org) or visit your local branch.

Mail-in Form

Mark any/all you want to limit:

☐ Do not use my personal information to market to me.

☐ Do not share information about my transactions and experiences with your affiliates for their everyday business purposes.

☐ 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.

Name		<b>Mail to:</b>  ESL Federal Credit Union Attn: Deposit Operations P.O. Box 23017 Rochester, NY 14692-9962
Address		
City, State, Zip		
Member Number(s)		



Who we are	
Who is providing this notice?	ESL Federal Credit Union

What we do	
How does ESL protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law and we only work with companies that agree to maintain strong confidentiality protections and limit use of information we provide. These measures include computer safeguards and secured files and buildings.
How does ESL collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"><li>• Open an account</li><li>• Make deposits or withdrawals from your account</li><li>• Use your credit or debit card</li><li>• Apply for a loan</li><li>• Show your government-issued ID</li></ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"><li>• Sharing for affiliates' everyday business purposes - information about your creditworthiness</li><li>• Affiliates from using your information to market to you</li><li>• Sharing for nonaffiliates to market to you</li></ul> <p>State laws and individual companies may give you additional rights to limit sharing.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account.

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial or nonfinancial companies. Our affiliates include financial companies such as ESL Investment Services, LLC and ESL Trust Services, LLC.
Nonaffiliates	Companies not related by common ownership or control. They can be financial or nonfinancial companies. Nonaffiliates we share with can include credit card companies, Internet Banking provider, credit counseling provider and rewards provider. ESL Federal Credit Union does not share with nonaffiliates so they can market to you.
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"><li>• <i>ESL Federal Credit Union doesn't jointly market</i></li></ul>