



PRIVACY NOTICE

Last Updated August 13, 2018

Introduction

Volunteer Corporate Credit Union (referred to in this Privacy Notice as “we,” “us,” “our” or “VolCorp”), operates the websites volcorp.org, volcorp.com, volcorp.mobil, volcorpdesign.org, vportfolio.org, v-portfolio.org, and v-portfolio.net, including the web pages, products, and services delivered through such websites (collectively, the “Site”), as well as the following apps: VolCorp Digipass (collectively, the “Apps”). We understand your concerns about privacy and are committed to protecting it through our compliance with this notice.

This Privacy Notice describes the types of information VolCorp collects from users (“users” or “you”): (a) when they access, use, or otherwise obtain products or services from the Site; (b) when they purchase, download, install, register with, access, or use the Apps; (c) and in email, text, and other electronic communications sent through or in connection with the Site or the Apps. This Privacy Notice also describes our practices for collecting, using, maintaining, protecting, and sharing that information, as well as certain rights and options that you have with regard to your personal information.

We do not collect any personal information about you unless you voluntarily provide it to us. However, you may be required to provide certain personal information to us when you elect to contact us, register with the Site or the Apps, or obtain certain products or services from the Site or the Apps.

This Privacy Notice does not apply to: (i) information collected by VolCorp offline or through any other means, including any other website or app operated by any third party (including our affiliates and subsidiaries); or (ii) any third party (including our affiliates and subsidiaries), including through any app or content (including advertising) that may link to or be accessible from or on the Site or the Apps.

PLEASE READ THIS PRIVACY NOTICE CAREFULLY TO UNDERSTAND HOW WE TREAT YOUR INFORMATION AND WHAT CHOICES AND RIGHTS YOU HAVE IN THIS REGARD. IF YOU DO NOT AGREE WITH THE TERMS AND CONDITIONS OF THIS PRIVACY NOTICE, DO NOT ACCESS OR USE THE SITE OR THE APPS.

Changes to This Privacy Notice

We reserve the right to update and change this Privacy Notice from time to time in order to reflect any changes to the way in which we treat your personal information or in response to changes in applicable law. We will post any changes we make to this Privacy Notice on this page of the Site and the Apps. You are expected to carefully review this Privacy Notice from time to time so you are aware of any changes. If we make material changes to how we treat your personal information, we will notify you through a notice on



the Site's home page, a prominent notice on the Apps, and, when appropriate, through email communication. You are responsible for ensuring we have an up-to-date active and deliverable email address for you. The date this Privacy Notice was last updated is identified at the top of this Privacy Notice.

What Information Do We Collect and Why?

We may collect and process the following information from you for the following purposes:

Category	Types of Data and Purpose
Personal Information	We collect information you share through the Site and the Apps, including the following personal information: user name, password, email address, first name, and last name. As a general rule, we use personal information only for processing transactions on behalf of our clients or for the purpose for which you have divulged the data to us, such as to answer your inquiries or provide you with the information, products, or services you have requested from us.
Non-Personal Information	We also collect non-personal information including, but not limited to, the kind of product or service you are seeking from VolCorp. We use this information for sales, customer service, and technical support purposes, such as providing support to our clients, answering your inquiries, or providing you with information about specific products or services.
Financial Information	When necessary in order to respond to your requests, or when you voluntarily provide such information in connection with your use of certain services or features offered on the Site or the Apps, we collect information necessary to process the transactions associated with those requests, services, or features, including account numbers, payment card numbers, security codes, expiration dates, and other related billing or account information. We will collect this financial information with your express consent or as otherwise permitted by applicable law.
Automated Information	When you visit our Site or use our Apps, we automatically collect information from your browser or your mobile device, such as: Internet Protocol (IP) address; the originating name of the domain from which you access the Internet; the date and time you access the Site or the Apps; the pages of the Site or the Apps that you visit or use; the Internet address of the website from which you linked directly to our Site; and the type

	<p>of operating system and/or browser you use to access the Site or the Apps.</p> <p>We collect this information in order to operate and provide the Site, the Apps, and our products and services. This information is used to protect our Site, Apps, products, and services, and to help us improve the Site or the Apps by tabulating the number of visitors to the Site and number of users of the Apps in terms of new users, origin of referrers, popularity of pages, amount of use, and types of errors, and to make the Site and the Apps more useful to you. We analyze this data for certain trends in statistics, such as which parts of the Site users are visiting and how long they spend there, as well as which Apps and which features of the Apps are being used.</p> <p>We use our web servers, cookies, Google Analytics, Google Analytics SDK, and other analytics technologies and SDKs to collect and process this information. The information automatically collected is statistical data and does not include personal information, and we do not maintain it or associate it with personal information we collect in other ways or receive from third parties. You may learn more about how Google uses the information it collects by visiting the following site “How Google uses data when you use our partners’ sites or apps” (located at https://www.google.com/policies/privacy/partners/).</p>
Location Information	<p>When you use our Site or the Apps, we collect information about your location when using our Site, Apps, products, and services for internal analytics purposes and to protect our Site, Apps, products, and services. Location information that we collect includes your Internet Protocol (IP) address and geolocation data.</p>
Camera Information	<p>When you use the Apps, we access your device’s camera and collect information from the camera in order to read QR registration codes (and avoid you having to manually enter 300 character security tokens).</p>
Biometric Information	<p>The Apps have the ability to collect biometric information (face or thumbprint information) if you enable that feature as a secondary authentication method. The biometric information is used to authenticate the user of the App.</p>



<p>Cookies and Similar Technologies</p>	<p>Cookies are small files created by a website that are stored on a user's computer or device either temporarily for that session only (session cookie) or permanently (persistent cookie). When you visit our Site, we use cookies and similar technologies to, among other things, store session/authentication status for single sign-on purposes, provide you with a more personal and interactive experience on our Site, and for usage analytics for our Site (e.g., page response times, download errors, length of visit, pages visited, etc.). If you choose to disable cookies and similar technologies, some areas and features of the Site may not work properly.</p>
<p>Email Interconnectivity</p>	<p>If you receive email communications from us, we may use certain technologies to capture data related to when you open our message or click on any links or banners it contains. We use this information to track the effectiveness of our email communications.</p>
<p>Support / Inquiries</p>	<p>If you contact us for support or ask us questions, we will collect the information you provide to us over the phone or in your email message. Typically, we will need your name, company, email address, telephone number, and a description of the nature of your issue or request in order to respond to your request for support or answer your question. If you contact us by email, we will retain copies of your correspondence. If you contact us by telephone, the conversation may be recorded. In each case, we collect or record this information for purposes of evaluating the quality of VolCorp services or to protect both parties in the event of a dispute.</p>
<p>e-Alerts</p>	<p>When you sign up for our e-Alerts, we collect your first name, last name, email address, company name, city, state, and date of birth (optional) so that we can deliver the e-Alerts to you.</p>
<p>Sensitive Personal Information</p>	<p>The only sensitive personal information that VolCorp collects is financial information (as described above). VolCorp does not collect information regarding your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health information, or data concerning your sex life or sexual orientation.</p>



How Will We Use Your Information?

In addition to the uses described above, VolCorp may use your information in the following ways:

- To manage our relationship with you, including administering your accounts and processing transactions;
- To present and improve Site and App content and functionality;
- To determine user interests, needs and preferences;
- To provide notice of changes to our Site, Apps, or the products and services we offer or provide through them;
- To develop new products and services;
- To manage and maintain the security of our Site, Apps, products, and services;
- To market our products and services to you; (Where legally required to do so, we will only provide you with marketing related information after you have opted in to receive those communications and we have provided you with the opportunity to opt-out of such communications at any time. VolCorp does not sell, rent or lease your personally identifiable information to third parties.)
- To comply with our legal and compliance obligations, including maintaining records, performing compliance audits, etc.
- For insurance purposes;
- To exercise and defend our legal rights, or to comply with court orders;
- For any other purpose related to and/or ancillary to any of the purposes and uses described in this Privacy Notice for which your personal information was provided to us;
- In any other way we may describe when you provide the information; and
- For any other purpose to which you have consented.

We may process your personal information in connection with any of the purposes and uses set out in this Privacy Notice on one or more of the following legal grounds:

- because it is necessary for us to do so to perform the services or provide the information or products you have requested, to comply with your instructions, or other contractual obligations between you and VolCorp;



- to comply with our legal obligations as well as to keep records of our compliance processes;
- because our legitimate interests, or those of a third-party recipient of your personal information, makes the processing necessary, provided those interests are not overridden by your interests or fundamental rights and freedoms;
- because it is necessary to protect your vital interests;
- because it is necessary in the public interest; or
- because you have expressly given us your consent to process your personal information in a particular manner.

We do not use your personal information for making any automated decisions affecting or creating profiles other than as described above.

Disclosure of Your Personal Information

We may share your personal information in the following contexts:

Category	Disclosure Contexts
Personal Information	We disclose such information to our affiliates, subsidiaries, and divisions, and each of our and their officers, directors, employees, accountants, attorneys, agents, and/or business partners as necessary to provide you with the information, products, or services you have requested from us, answer your inquiries, or any other purpose for which you have provided the information to us. We also disclose such information to our member credit unions if the information is related to information, products, or services that we are providing on behalf of the applicable member credit union.
Non-Personal Information	We disclose such information to our affiliates, subsidiaries, and divisions, and each of our and their officers, directors, employees, accountants, attorneys, agents, and/or business partners on an “as needed” basis. We also disclose such information to our member credit unions if the information is related to information, products, or services that we are providing on behalf of the applicable member credit union. We may share non-personal information with third parties on an individual or aggregate basis.
Financial Information	We disclose such information to our affiliates, subsidiaries, and divisions, and each of our and their officers, directors, employees, accountants, attorneys, agents, and/or business



	partners on an “as needed” basis. We also disclose such information to our member credit unions if the information is related to information, products, or services that we are providing on behalf of the applicable member credit union.
Automated Information	We disclose such information to our affiliates, subsidiaries, and divisions, and each of our and their officers, directors, employees, accountants, attorneys, agents, and/or business partners on an “as needed” basis. We also disclose such information to our member credit unions if the information is related to information, products, or services that we are providing on behalf of the applicable member credit union.
Location Information	We disclose such information to our affiliates, subsidiaries, and divisions, and each of our and their officers, directors, employees, accountants, attorneys, agents, and/or business partners on an “as needed” basis. We also disclose such information to our member credit unions if the information is related to information, products, or services that we are providing on behalf of the applicable member credit union. We may share location information with third parties on an aggregate basis.
Camera Information	The Apps have the ability to access your device’s camera to collect QR registration codes. The QR registration codes collected from the camera are used to avoid you having to manually enter 300 character security tokens and are not otherwise disclosed to any third party.
Biometric Information	The Apps have the ability to collect biometric information (face or thumbprint information) if you enable that feature as a secondary authentication method. The biometric information is used to authenticate the user of the App and is not otherwise disclosed to any third party.
Email Interconnectivity	We disclose such information to our affiliates, subsidiaries, and divisions, and each of our and their officers, directors, employees, accountants, attorneys, agents, and/or business partners on an “as needed” basis.
Support / Inquiries	We disclose such information to our affiliates, subsidiaries, and divisions, and each of our and their officers, directors, employees, accountants, attorneys, agents, and/or business partners on an “as needed” basis.



e-Alerts	We disclose such information to our affiliates, subsidiaries, and divisions, and each of our and their officers, directors, employees, accountants, attorneys, agents, and/or business partners on an “as needed” basis.
Sensitive Personal Information	The only sensitive personal information that VolCorp collects is financial information. We disclose such information as described above in the “Financial Information” section.
Third Parties	In certain circumstances, we may share data with trusted third-party vendors to help us develop the Site or the Apps, provide you with products and/or services that you requested from us, perform statistical analysis, send you communications, provide support, or enforce or apply our terms and conditions and other agreements. All such third parties are required to maintain the confidentiality of your information and are prohibited from using your personal information except to provide services to VolCorp or as required by law.
Legal / Safety / Fraud	We provide information to regulatory authorities and law enforcement officials in accordance with applicable law or when we otherwise believe in good faith that the law requires it. We will disclose your information in order to protect or defend the legal rights or property of VolCorp and its affiliates and/or subsidiaries, and their employees and agents, to protect the safety and security of users, and to protect against fraud.
Sale of Assets / Bankruptcy	If VolCorp sells, transfers, or otherwise shares some or all of its assets in connection with a merger, reorganization, or sale of assets, or in the event of bankruptcy, your personal information will be one of the assets sold, transferred, or shared.

Choices about How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Cookies and Similar Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable



or refuse cookies, please note that some parts of the Site or Apps may then be inaccessible or not function properly.

- **Geolocation Data.** You can adjust the settings in the Apps to not collect geolocation data.
- **Disclosure of Your Information for Third-Party Advertising.** VolCorp does not share your personal information with unaffiliated third parties for promotional purposes.
- **Analytics Opt-out Options.** If you do not want your information collected with Google Analytics, you can install the Google Analytics opt-out browser add-on. To opt-out of Google Analytics, visit the Google Analytics opt-out page (located at <https://tools.google.com/dlpage/gaoptout>) and install the add-on for your browser. For more details, visit the “Google Analytics opt-out browser add-on” page (located at <https://support.google.com/analytics/answer/181881?hl=en>).
- **Device Opt-out Options.** Your mobile device may provide options to (a) opt-out of receiving notifications or advertisements, (b) to limit ad tracking, or (c) to disallow access to the device’s camera. Please refer to your device’s settings to determine the options available for your device. If you disable access to the device’s camera, please note that some parts of the Apps may then be inaccessible, not function properly, or more difficult to use.

How Long Do We Store Your Personal Information?

VolCorp will retain your personal information for as long as needed to fulfill the purposes for which it was collected. We also will retain and use your personal information as long as necessary to comply with our business requirements, legal obligations, resolve disputes, protect our assets, provide our products and services, and enforce our agreements.

When we no longer have a purpose to retain your personal information, we will securely destroy your personal information in accordance with applicable law and our policies.

Security of Your Personal Information

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. While our security measures seek to protect your personal information in our possession, no security system is perfect and VolCorp cannot promise that your personal information will remain absolutely secure in all circumstances.

The safety and security of your personal information also depends on you. Where you use a password for access to restricted parts of the Site or the Apps, you are responsible for keeping the password confidential. Do not share your password with anyone.



If a security breach causes an unauthorized intrusion into our Site, the Apps, or our systems that compromises your data, we will notify you and any applicable regulator when we are required to do so by applicable law.

Updating Your Personal Information

If the personal information you have provided to us changes, please let us know. For instance, if your email changes, you wish to cancel any request you have made of us, or if you become aware of inaccurate personal information that we have about you, use the “Contact Information” details at the end of this Privacy Notice to contact us so we can update your information.

We are not responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal information that you provide to us.

Your Rights to Access and Control Your Personal Information

Please use the “Contact Information” details at the end of this Privacy Notice to exercise your rights and choices under this Privacy Notice.

Right of Access. If required by law (e.g., under the GDPR) and upon request, we will grant reasonable access to the personal information that we hold about you.

Accuracy. Our goal is to keep your personal information accurate, current, and complete. Please contact us if you believe your information is not accurate or changes.

Right to Object. In certain circumstances, as permitted under applicable law, you have the right to object to processing of your personal information and to ask us to erase or restrict our use of your personal information. If you would like us to stop using your personal information, please contact us and we will let you know if we are able to agree to your request.

Right to Erasure and Deletion of Your Personal Information. You may have a legal right (for instance, under the GDPR if you are located in the EU or EEA) to request that we delete your personal information when it is no longer necessary for the purposes for which it was collected, or when, among other things, your personal information has been unlawfully processed. All deletion requests should be sent to the address noted in the “Contact Information” section of this Privacy Notice. We may decide to delete your personal information if we believe it is incomplete, inaccurate, or that our continued storage of your personal information is contrary to our legal obligations or organizational objectives. When we delete personal information, it will be removed from our active servers and databases and our Site and Apps, but it may remain in our archives when it is not practical or possible to delete it. We may also retain your personal information as needed to comply with our legal obligations, resolve disputes, or enforce any agreements.

Right to Withdraw Consent. If you have provided your consent to the collection, processing, and transfer of your personal information, you have the right to fully or partially



withdraw your consent. To withdraw your consent, please notify us using the information in the “Contact Information” section of this Privacy Notice. You may also withdraw your consent to receiving email communications by using the opt-out or unsubscribe links contained in the email communications we send to you.

Once we have received notice that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented unless there are compelling legitimate grounds for further processing that override your interests, rights, and freedoms, or for the establishment, exercise, or defense of legal claims.

Withdrawal of consent to receive marketing communications will not affect the processing of personal information for the provision of other products or services.

Right to Complain. If you believe that your rights relating to your personal information have been violated, you have a right to lodge a complaint with the applicable enforcement authority, or seek a remedy through the courts. You may also lodge a complaint with us by contacting us using the information provided in the “Contact Information” section of this Privacy Notice.

Online Tracking. We do not currently recognize browser settings or signals of tracking preferences, which may include “Do Not Track” instructions.

California Residents. California residents may be entitled to ask us for a notice describing what categories of personal information (if any) we share with third parties or affiliates for those parties to use for direct marketing. If you are a California resident and would like a copy of such notice, please submit a written request to us using the information in the “Contact Information” section of this Privacy Notice. Please note, however, that VolCorp does not disclose personal information to third parties for their direct marketing purposes.

European Union or European Economic Area Residents. If you are located in the EU or EEA and believe we have not processed your personal information in accordance with applicable provisions of the GDPR, you may lodge a complaint with your local data protection or supervisory authority.

Cross Border Transfers of Personal Information

VolCorp is located and established in the United States and therefore, your personal information may be transferred to, stored, or processed in the United States. While the data protection, privacy, and other laws of the United States might not be as comprehensive as those in your country, we take necessary and appropriate steps to protect the security and privacy of your personal information. By using our Site or the Apps, or requesting information, products or services from us, you understand and consent to the collection, storage, processing, and transfer of your personal information to our facilities in the United States and those third parties with whom we share it as described in this Privacy Notice.



Residents of the EU / EEA. We rely on recognized legal bases to lawfully conduct cross-border transfers of personal information outside of the EU and EEA, such as your express informed consent (as noted above), when transfer is necessary for us to deliver products or services pursuant to an agreement or contract for such products or services between VolCorp and you, or when the transfer is subject to safeguards that assure the protection of your personal information, such as the European Commission’s approved standard contractual clauses.

Third Party Websites

This Privacy Notice is applicable only to the Site and the Apps, and does not apply to any third party websites or to other companies or persons that may access the Site or the Apps, with or without our permission. This Site and the Apps may contain links to, and media and other content from, third party websites. If you click on an embedded third-party link, you will be redirected away from this Site or the applicable App to the external third-party website. You can check the URL to confirm that you have left this Site or the applicable App.

VolCorp cannot and does not (i) guarantee the adequacy of privacy, security, practices, content, or media provided by third parties or their websites, (ii) control third parties’ independent collection or use of your personal information, or (iii) endorse any third party information, products, services, or websites that may be reached through embedded links on our Site or the Apps.

Any personal information provided by you or automatically collected from you by a third party will be governed by that party’s privacy policy and terms of use.

Protecting Children

The Children’s Online Privacy Protection Act (“COPPA”), as well as other data privacy regulations, restrict the collection, use, or disclosure of personal information from and about children. Our Site, Apps, products, and services are not directed to children under the age of 18, nor is information knowingly collected from children under the age of 18. No one under the age of 18 may access, browse, or use the Site or the Apps, or provide any information to, on, or through the Site or the Apps. If you are under 18, do not use or provide any information on this Site or the Apps. If we learn that we have collected or received personal information from a child under the age of 18, we will take steps to stop collecting that information and delete it. If you believe that we could be holding information on a child under 18, please contact us using the information provided in the “Contact Information” section of this Privacy Notice.

For more information about COPPA, please visit the Federal Trade Commission’s website at: <https://www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/childrens-online-privacy-protection-rule>.



Governing Law

This Privacy Notice and any disputes related thereto shall be governed by and construed in accordance with the laws of the State of Tennessee, exclusive of its choice of law rules.

Contact Information

If you have questions or comments about this Privacy Notice, wish to access personal information we hold about you, believe the personal information we have about you is incorrect, or wish to lodge a complaint with us about how we have handled your personal information, please contact us using the contact details below and we will do our best to assist you:

By email: marketing@volcorp.org

By telephone: (615) 232-7900

(800) 470-3444 (toll free)

(615) 232-7977 (after hours support) (4:15 p.m. - 8:00 p.m. Central)