



## **Twilio Short Code Privacy Policy**

The Pioneer Federal Credit Union text messaging application and the associated Pioneer website available at [www.pioneerfcu.org](http://www.pioneerfcu.org) ("Pioneer text messaging") are owned and operated by Pioneer Federal Credit Union ("us" "we" or "our"). This Pioneer text messaging privacy policy (the "Privacy Policy") is intended to inform you of our policies and practices regarding the collection, use and disclosure of any information you submit to us through Pioneer text messaging. This includes "Personal Information," which is information about you that is personally identifiable such as your name, e-mail address, user ID number, and other non-public information that is associated with the foregoing, as well as "Anonymous Information," which is information that is not associated with or linked to your Personal Information and does not permit the identification of individual persons.

### **User Consent**

By accessing or otherwise using Pioneer text messaging you agree to the terms and conditions of this Privacy Policy and the associated Terms of Service (set forth on [www.pioneerfcu.org/textTOS](http://www.pioneerfcu.org/textTOS)) you expressly consent to the processing of your Personal Information and Anonymous Information according to this Privacy Policy. Your Personal Information may be processed by us in the country where it was collected as well as other countries (including the United States) where laws regarding processing of Personal Information may be less stringent than the laws in your country.

### **Regarding Children**

Children under the age of 13 are not permitted to use Pioneer text messaging and we do not intentionally collect or maintain Personal Information from those who are under 13 years old. Protecting the privacy of children is very important to us. Thus, if we obtain actual knowledge that a user is under 13, we will take steps to remove that user's Personal Information from our databases. We recommend that children between the ages of 13 and 18 obtain their parent's permission before submitting information over the internet. By using Pioneer text messaging, you are representing that you are at least 18 years old, or that you are at least 13 years old and have your parents' permission to use Pioneer text messaging.

### **Collection and Use of Information Personal Information**

In general, we collect Personal Information that you submit to us voluntarily through Pioneer text messaging. We also collect information that you submit in the process of creating or editing your account and user profile on Pioneer text messaging. For example, our registration and login process requires you to provide us with your name, valid email address and password of your choice. When you personalize your profile and use the features of Pioneer text messaging, we will collect any information you voluntarily provide, and we may also request optional information to support your use of Pioneer text messaging, such as your year of birth, gender and other demographic information. We collect information in the form of the content that you submit during your use of Pioneer text messaging, such as photos, comments, ratings and other information you choose to submit. We may also collect information about you and your friends,

from any social network you may have connected from, in order to provide you with a more personalized experience. For instance, we may collect your user ID or profile information that you have permitted to be displayed through Pioneer text messaging in order to display you as a friend or in association with your profile and collections. When you order our products or services, you will need to submit your credit card or other payment information so that our service providers can process your payment for those products and services. If you choose to sign up to receive information about products or services that may be of interest to you, we will collect your email address and all related information. Additionally, we collect any information that you voluntarily enter, including Personal Information, into any postings, comments, or forums within the Pioneer text messaging community.

### **Personal Information from Other Sources**

We may receive Personal Information about you from other sources with which you have registered, companies who we have partnered with (collectively, "Partners") or other third parties. We may associate this information with the other Personal Information we have collected about you.

### **E-mail and E-mail Addresses**

If you send an e-mail to us or fill out our "Feedback" form through Pioneer text messaging, we will collect your e-mail address and the full content of your e-mail, including attached files, and other information you provide. We may use and display your full name and email address when you send an email notification to a friend through Pioneer text messaging or the social network from which you have connected to Pioneer text messaging (such as in an invitation, or when sharing your content). Additionally, we use your email address to contact you on behalf of your friends (such as when someone sends you a personal message) or notifications from a social network or other website with whom you have registered to receive such notifications. We may use this e-mail address to contact you, for things such as notifications of limited-edition shop sales and other related information. You may indicate your preference to stop receiving further promotional communications as further detailed below.

### **Information Collected Via Technology**

As you use Pioneer text messaging, certain information may also be passively collected and stored on our or our service providers' server logs, including your Internet protocol address, browser type, and operating system. We also use Cookies and navigational data like Uniform Resource Locators (URL) to gather information regarding the date and time of your visit and the solutions and information for which you searched and viewed, or on which of the advertisements displayed on Pioneer text messaging you clicked. This type of information is collected to make Pioneer text messaging and solutions more useful to you and to tailor the experience with Pioneer text messaging to meet your special interests and needs.

An "Internet protocol address" or "IP Address" is a number that is automatically assigned to your computer when you use the Internet. In some cases, your IP Address stays the same from browser session to browser session; but if you use a consumer internet access provider, your IP Address probably varies from session to session. For example, we, or our service providers, may track your IP Address when you access Pioneer text messaging to assist with ad targeting.

"Cookies" are small pieces of information that a website sends to your computer's hard drive while you are viewing a website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them)

to provide you with a more personal and interactive experience with Pioneer text messaging. Persistent Cookies can be removed by following your Internet browser help file directions. In order to use our services offered through Pioneer text messaging, your web browser must accept Cookies. If you choose to disable Cookies, some aspects of Pioneer text messaging may not work properly, and you will not be able to receive our services.

We may also enable advertisers and ad servers to promote third-party products and/or services by placing advertisements on Pioneer text messaging. These advertisers and ad servers may use Cookies and/or "Web Beacons" (which are usually small, transparent graphic images) in order to monitor information related to served advertisements. Clicking on such advertisements will direct you to the website of a third-party and the advertiser. This Privacy Policy does not cover the privacy practices of any advertisers or ad servers.

### **Use and Disclosure of Information**

Except as otherwise stated in this Privacy Policy, we do not generally sell, trade, rent, or share the Personal Information that we collect with third parties, unless you ask or authorize us to do so.

In general, Personal Information you submit to us is used by us to provide you access to Pioneer text messaging, to improve Pioneer text messaging, to better tailor the features, performance, and support of Pioneer text messaging and to offer you additional information, opportunities, promotions and functionality from us, our partners or our advertisers at your request. Additionally, we do share your content preferences and other information with the social network from which you have connected to Pioneer text messaging, along with those companies and persons you have asked us to share your information with.

We may provide your Personal Information to third-party service providers who work on behalf of or with us to provide some of the services and features of Pioneer text messaging and to help us communicate with you. Examples of such services include sending email, analyzing data, providing marketing assistance, processing payments (including credit card payments), and providing customer service. We require our third-party service providers to promise not to use such information except as necessary to provide the relevant services to us. We may share some or all of your Personal Information with our third-party partners, those with whom we have a co-branding or promotional relationship, or other third parties about whom you are otherwise notified and do not request to opt out of such sharing. This Privacy Policy does not cover the use of your personally identifiable information by such third parties. We do not maintain responsibility for the manner in which third parties, including, without limitation, social networks, other partners and advertisers, use or further disclose Personal Information collected from you in accordance with this Privacy Policy, after we have disclosed such information to those third parties. If you do not want us to use or disclose Personal Information collected about you in the manners identified in this Privacy Policy, you may not use Pioneer text messaging.

Although we currently do not have a parent company, any subsidiaries, joint ventures, or other companies under a common control, we may in the future, and we may share some or all of your Personal Information with these companies, in which case we will require them to honor this Privacy Policy.

In the event we go through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your Personal Information may be among the assets transferred. You acknowledge that such transfers may occur and are permitted by this Privacy Policy, and that any acquirer of ours or that acquirer's assets may continue to process your Personal Information as set forth in this Privacy Policy.

We may disclose your Personal Information if we believe in good faith that such disclosure is necessary to (a) comply with relevant laws or to respond to subpoenas or warrants served on us; or (b) to protect and defend our rights or property, you, or third parties. You hereby consent to us sharing your Personal Information under the circumstances described herein.

### **The Ability of others to View your Information**

Helping you to protect your information is a vital part of our mission. It is up to you to make sure you are comfortable with the information you choose to provide us and the information you choose to publish. You understand that when you use Pioneer text messaging, certain information you post or provide through Pioneer text messaging, such as your name, profile, comments, posts and ratings, may be shared with other users and posted on publicly available portions of Pioneer text messaging, including without limitation, chatrooms, bulletin and message boards, along with other public forums. Please keep in mind that if you choose to disclose Personal Information when posting comments or other information or content through Pioneer text messaging, this information may become publicly available and may be collected and used by others, including people outside the Pioneer text messaging community. We will not have any obligations with respect to any information that you post to parts of Pioneer text messaging available to others and recommend that you use caution when giving out personal information to others in public forums online or otherwise. We also share the information you publish with other third parties.

### **Third Party Sites and Advertising**

Pioneer text messaging may contain links to other websites. Please be aware that we are not responsible for the privacy practices or the content of such other websites. We encourage our users to read the privacy statements of each and every website they visit. This Pioneer text messaging applies solely to information collected by us through Pioneer text messaging and does not apply to these third-party websites. The ability to access information of third-parties from Pioneer text messaging, or links to other websites or locations, is for your convenience and does not signify our endorsement of such third parties, their products, their services, other websites, locations or their content.

### **Your Choices Regarding Your Personal Information**

We offer you choices regarding the collection, use, and sharing of your Personal Information. When you receive promotional communications from us, you may indicate a preference to stop receiving further promotional communications from us and you will have the opportunity to "opt-out" by following the unsubscribe instructions provided in the promotional e-mail you receive or by contacting us directly (please see contact information below).

Despite your indicated email preferences, we may send you administrative emails regarding Pioneer text messaging, including, for example, administrative confirmations, and notices of updates to our Privacy Policy if we choose to provide such notices to you in this manner.

You may change any of your profile information by editing it in the profile settings page. You may request deletion of your Personal Information by contacting us at [marketing@pioneerfcu.org](mailto:marketing@pioneerfcu.org), but

please note that we may be required (by law or otherwise) to keep this information and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request, only after we have fulfilled such requirements). When we delete Personal Information, it will be deleted from the active database, but may remain in our archives.

### **Feedback**

If you provide feedback to us, we may use and disclose such feedback for any purpose, provided we do not associate such feedback with your Personal Information. We will collect any information contained in such feedback and will treat the Personal Information in it in accordance with this Privacy Policy. You agree that any such comments and any email we receive becomes our property. We may use feedback for marketing purposes or to add to or modify our services without paying any royalties or other compensation to you.

### **Security**

We are committed to protecting the security of your Personal Information. We use a variety of industry-standard security technologies and procedures to help protect your Personal Information from unauthorized access, use, or disclosure. Even though we have taken significant steps to protect your Personal Information, no company, including us, can fully eliminate security risks associated with Personal Information.

### **Contact and Revisions**

If you have questions or concerns about our Privacy Policy, please contact us at [marketing@pioneerfcu.org](mailto:marketing@pioneerfcu.org). This Privacy Policy is subject to occasional revision at our discretion, and if we make any substantial changes in the way we use your Personal Information, we will post an alert on this page. If you object to any such changes, you must cease using Pioneer text messaging. Continued use of Pioneer text messaging following notice of any such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.