



Last Updated: August 31, 2024

## BECU ONLINE PRIVACY NOTICE

Welcome! Boeing Employees' Credit Union (**BECU** or **we**) is pleased to present this Privacy Notice (**Privacy Notice**). This Privacy Notice reflects our commitment to respecting and protecting the privacy of our members and others who trust us with their personal information. Please read this Privacy Notice carefully to learn how this Privacy Notice applies to certain personal information that BECU collects from or about you and how BECU shares and protects that personal information.

Information collected when you apply for or when we provide you our financial products or services is governed by our [U.S. Consumer Privacy Notice](#). If you are a California resident, you may have rights as described in [BECU's California Consumer Privacy Notice](#). Please check these other notices for more information about how BECU handles the personal information to which they apply.

### I. WHAT IS PERSONAL INFORMATION?

BECU uses the term “**personal information**” to refer to information that identifies or can be used to identify you, such as your name, mailing address, email address, telephone number, account numbers, and information collected by cookies and other similar technology. The personal information that BECU collects depends on how you interact with BECU.

Data that does not identify and cannot be used to identify any individual (**Aggregated Data**) is not personal information.

### II. WHEN AND WHERE DOES THIS PRIVACY NOTICE APPLY?

Generally, this Privacy Notice applies where we make it available to you, reference it, and/or when you are asked to acknowledge it.

Specifically, this Privacy Notice applies to personal information we collect from various online and offline services that link to or reference this Privacy Notice (**BECU Services**), including:

- <https://www.becu.org/>, [www.becuhomeloans.org](http://www.becuhomeloans.org) and any other BECU-branded website or online service in which it is linked or referenced
- BECU's digital banking web applications
- BECU mobile applications available for your iOS and Android devices (e.g., phone or tablet) in [The App Store](#) and [Google Play](#) (**BECU Apps**).
- BECU's digital advertising campaigns

As noted above, other privacy notices apply depending on how you interact with us, the financial products or services you obtain from us, and the jurisdiction in which we do business with you. If a particular website or online service links to a different privacy notice or statement, then that privacy notice or statement – not this Privacy Notice – applies. Please check the applicable privacy disclosures to learn how BECU handles your personal information.



By using the BECU Services, you acknowledge and consent to the collection, use, disclosure, and other processing of your personal information as described in this Privacy Notice.

Please read this Privacy Notice together with the terms and conditions that apply to the relevant BECU Services, including the [BECU Website Terms and Conditions](#).

This Privacy Notice does **not** apply to:

- *Third-Party Websites and Services:* The BECU websites and BECU App may contain links to websites and services owned and/or operated by other organizations. BECU is not responsible for the content or privacy practices of these other websites and services and has no control over their privacy practices. We recommend that you carefully review the privacy notice, policy, or statement for each website and service.
- *Employees and Job Applicants:* If you are applying for employment at BECU, please review our [Job Applicant Privacy Policy](#) for information about how we handle job applicants' personal information.

We do not knowingly collect personal information from children under age 13 (or age 16 if you are a California resident) without parental consent. If you are a parent or legal guardian of a child who has provided personal information to BECU without your consent, please Contact Us at [privacy@becu.org](mailto:privacy@becu.org) to request deletion of your child's personal information.

### **III. WHAT PERSONAL INFORMATION IS COLLECTED BY OR ON BEHALF OF BECU?**

BECU collects personal information directly from you, as well as from your devices and the online applications that you use to access the BECU Services, authenticate your identity, and otherwise access and use our products and services. BECU's vendors operate some of our online services, in which case BECU also may receive personal information from BECU's vendors when they collect information directly from you on BECU's behalf. BECU also collects information from third-party sources as described in this Privacy Notice.

#### **1. INFORMATION THAT YOU PROVIDE TO BECU**

BECU collects:

- *Contact details:* name, postal address, email address, phone number, and similar contact data
- *Government-issued identifiers:* social security number, passport number, and similar identification numbers
- *Demographic data:* age, date of birth, gender, marital status, occupation, and income.
- *Account-related data:* account number, credit/debit card numbers, account history, account balance, loan information, information about beneficiaries and joint account owners, and similar information related to your BECU accounts
- *Transaction data:* credit/debit card purchases, transaction history, bill payment information, and similar information.
- *Online identifiers:* Internet Protocol (IP) address, device identifiers, mobile network information, web traffic logs, and details about your web browser when you interact with the BECU Services



- *Other Information:* Information in materials submitted for account opening and processing transactions, and personal information that you choose to give us when you submit feedback, when you respond to surveys and questionnaires that we send you, and when you engage with BECU through our social media accounts and our digital advertising campaigns.

In some cases, you provide your personal information directly to BECU's vendors. For example, when you apply to open an account, we may direct you to provide your personal information to one of our identity verification vendors. The vendor's use of your information is governed by BECU's services agreement with the vendor and, in some cases, the vendor's privacy policy and terms of use as presented to you at or before collection of your personal information. Please also see [Appendix 1](#).

When you sign up or maintain a personal, family, or household account with BECU, BECU's handling of your personal information is described in the [U.S. Consumer Privacy Notice](#).

## **2. IMAGES AND RECORDINGS**

BECU partners with identity verification vendors to collect and use digital photos and facial scans and audio and video recordings of voice patterns (***Images and Recordings***). Certain laws may deem some of these Images and Recordings as regulated biometric data.

BECU's identity verification vendors collect and use Images and Recordings to support BECU's identity verification, security, and fraud prevention efforts. For example:

- *Images.* BECU's vendor partners collect and compare images of faces with the images in identity documents (e.g., passport photo) to determine the likelihood that they match. In some cases, you may provide these materials directly to an identity verification vendor; in other cases, BECU will collect Images directly from you.
- *Recordings.* When you contact BECU by telephone or use the recorded voice customer service line or interactive voice response (***IVR***) systems, the telephone call is recorded for quality assurance and training purposes. BECU and its vendors use the call recording to identify and authenticate a caller for the purpose of identifying, monitoring, and tracking phone-based fraud and suspicious transactions.

BECU and these identity verification vendors collect and use Images and Recordings pursuant to the consent that you provide at the time you agree to establish a voiceprint and/or faceprint for us to use to authenticate you when you open, access, or make changes to any of your financial accounts with us.

BECU retains Images and Recordings only as long as necessary to achieve the purpose for which they were collected or, if longer, for three years after your last interaction with BECU or one year from ending your membership with BECU, unless BECU is legally required to keep your Images and Recordings for a different period.

If you use the biometric identification tool on your device's operating system (e.g., Face Unlock or Face ID) to open a BECU App, then your biometric identification is stored only in your mobile device's operating system and is not available to BECU.

Please see [Appendix 1](#) for a list of our identity verification vendors.

### 3. AUTOMATICALLY COLLECTED INFORMATION

BECU automatically collects information – some of which is personal information - from and about use of the BECU Services from the computers and mobile devices of members and other users. Some automatically collected information is personal information under applicable law. This information is automatically collected using cookies, pixel, web beacons, and similar data collection technology (collectively, **data collection technology**). The BECU Services use data collection technology to associate BECU's information with information collected from other websites and online services.

The types of cookies that we and our identification verification and other data partners use are:

- *Necessary/Essential*: These cookies help us to operate and offer certain functionalities on the BECU Services, such as the ability to chat with an agent.
- *Analytics*: These cookies help us to understand how visitors interact with the BECU Services by collecting and reporting information about how you and your device interact with the BECU Services.
- *Social Media*: These technologies allow us to provide a user experience that is integrated with various social media platforms.
- *Advertising*: These cookies allow us to serve relevant advertising to you online.

Please see [Appendix 1](#) for a list of our data collection technology partners.

*From Online Activity*: The information that we automatically collect online includes:

- Information about your computer or mobile device, such as device type and identification number, browser type, internet service provider, mobile network, and operating system.
- IP address and broad geographic location (e.g., country or city-level location).
- How a computer or mobile device interacts with the BECU Services, including specific webpages accessed, the date and time webpages and applications are accessed, search requests and results, mouse clicks and movements, links clicked, and videos watched.
- Traffic and usage measurements.
- Data about the third-party sites or services accessed before interacting with the BECU Services, which is used to make advertising more relevant.
- Interactions with our marketing communications, such as whether and when a BECU marketing email is opened.
- Information associated with a social media account when you connect with BECU through a social media platform, such as Meta or Twitter. We automatically collect the personal information permitted by the social media platform and your account permissions.

Certain web browsers provide a do-not-track (**DNT**) signal that you can use to inform websites not to collect or track your browsing data. Whether your browsing data is tracked depends on how a website responds to the signal. Most websites including the BECU Services, do not respond to DNT signals.

*From the BECU Apps*: When you download and install one of the BECU Apps on your mobile device or tablet, the information that BECU collects depends on your device's operating system



and permissions. The BECU Apps need to use certain features and data from your device, such as mobile operating system and version, usage data and crash reports. If you allow it in your operating system settings, a BECU App also may collect precise geolocation. The BECU Apps also may automatically collect some information using data collection technology. To learn more about the specific information collected by the BECU Apps, please check your device's settings, or review the permissions information available on the mobile app platform (e.g., Google Play or App Store) from which you downloaded the BECU App. The BECU Apps also allow you to check or change your status for certain data collection; please note that if you change your settings, certain features may not function properly. To stop collection of all information through a BECU App, please uninstall the BECU App from your mobile device or tablet.

#### **4. INFORMATION THAT BECU COLLECTS FROM THIRD PARTIES**

BECU may collect information about you, including personal information, from third-party sources, such as credit reports from consumer reporting agencies, identity verification databases, and marketing services. BECU requires each third party to confirm in writing the lawfulness of its sharing of personal information with BECU. We may combine the information that we receive from third parties with personal information we already collected from or about you, in accordance with applicable law.

BECU also engages certain data vendors to provide data about members and prospective members for BECU's fraud detection and prevention efforts. Please see [Appendix 1](#) for BECU's key data vendors and their privacy practices.

BECU also collects personal information from publicly available sources which we may use to supplement the information that we have about you, in accordance with applicable law.

### **IV. HOW DOES BECU USE AND SHARE PERSONAL INFORMATION?**

#### **1. HOW BECU USES PERSONAL INFORMATION**

BECU uses personal information to:

- Provide you with services or other products, financial services, and information that you have requested or in connection with our financial services;
- Maintain your account;
- Allow you to apply for products or services and process your applications and transactions;
- Provide you with member services;
- Manage our business, including performing accounting, auditing, and other internal functions;
- Verify your identity and authenticate you (such as when you establish an account or change your account information);
- Detect and prevent fraud;
- Communicate with you about your account to notify you about important information regarding our financial services and to provide you with other administrative information;

- Communicate with you about special offers, events, or new products or services that we think may interest you;
- Evaluate and improve our websites and other offerings;
- Personalize and tailor our services and otherwise enhance the member experience;
- Conduct research and perform analysis in order to measure, maintain, protect, develop, and improve our products and services;
- Comply with laws and regulations, contractual obligations, and our own internal policies; and
- Use for other purposes as permitted by applicable law.

## **2. HOW BECU SHARES PERSONAL INFORMATION**

If you are a BECU member, we use and share your personal information as described in BECU's [U.S. Consumer Privacy Notice](#). The U.S. Consumer Privacy Notice provides information about the types of personal information sharing that you may limit. Specifically, federal law gives you the right to limit some but not all sharing related to: affiliates' everyday business purposes - information about your creditworthiness; affiliates using your information to market to you; and nonaffiliates marketing to you. For purposes of BECU's compliance with the [Gramm-Leach-Bliley Act](#), BECU does not share or sell your personal information or mobile numbers with third parties or nonaffiliates for their own marketing purposes.

For other personal information, BECU shares with:

- *Identity verification vendors*: BECU shares personal information about prospective members and members to assist with authentication, verification, and fraud detection.
- *Other vendors and suppliers*: BECU discloses personal information to its identity verification vendors and other vendors acting on our behalf, such as third-party payment card processors, call-center operators, shippers, servicers, marketing providers, and data analytics providers.
- *Credit bureaus*: We disclose personal information that we collect to credit bureaus to report on or learn about your financial background, and for other lawful purposes.
- *Social media platforms*: If you interact with us through a social media platform, the platform may be able to collect information about you and your interaction with us. For example, by clicking on a Facebook "Like" button in the BECU Services, both the platform and your connections on the platform may be able to view that activity. To control this sharing of information, please review the privacy policy of the relevant social media platform.
- *Online advertising partners*: We partner and share your personal information with companies that assist us in advertising our financial services, including partners that use cookies and other data collection technology to personalize, retarget, and measure the effectiveness of BECU's advertising.
- *Potential or actual acquirers or investors and their professional advisers*: BECU reserves the right to transfer your information (including personal information) in connection with any actual or proposed merger, acquisition of all or any part of our business, or in connection with an insolvency, bankruptcy, or receivership.
- *Professional advisors*, such as our lawyers, accountants, insurers, and forensics experts.



- *Government authorities:* We disclose personal information to government authorities (including law enforcement and courts) when we believe disclosure is necessary (i) to comply with the law, warrants, court orders, and subpoenas or similar valid requests for information, (ii) to exercise, establish or defend legal rights, or (iii) to protect the vital interests of members, our business partners, vendors, or the public. We also share data in other circumstances when we have a good faith belief that the law requires or permits sharing, such as in connection with an emergency or natural disaster.
- *Other third parties with your consent.*

Unless prohibited by law or contract, BECU shares Aggregated Data (which is not personal information) with BECU's business partners and other third parties without restriction.

### **3. HOW BECU USES AUTOMATED PROCESSING**

Where permitted by law, BECU uses automated decision-making and profiling tools (collectively, **automated processing**). We may use automated processing in the following situations:

- For customer engagement and to respond to customer inquiries about BECU
- To monitor use of the BECU Services in accordance with our content, governance, and information security policies.
- To prevent, investigate and/or detect unauthorized or illegal use of the BECU Services.
- To analyze certain personal information for targeted marketing strategies and customer segmentation analysis
- For data loss prevention

We provide notice or obtain consent for, and/or allow you to opt out of, automated processing as required by the applicable law.

### **V. HOW CAN I UPDATE MY PERSONAL INFORMATION OR OPT OUT OF MARKETING COMMUNICATIONS?**

You may review, correct, and update certain personal information (such as your name and contact information) by signing into your account on the BECU Services or a BECU App and editing the information listed in your account profile. You also may correct or update your personal information by contacting us via the [Contact Us](#) section in this Privacy Notice or by making the request in person at any of our BECU locations.

You occasionally may receive emails from BECU, including emails about products or services, marketing or promotions, research, and/or other topics. At any time, you may inform us that you do not want BECU to contact you with marketing or promotional communications, by sending your request via the [Contact Us](#) section in this Privacy Notice or by following any opt out instructions included with the communication.

After you opt out of specific marketing and promotional messages, you still will receive other transactional messages, such as notifications and information relating to your account and services, and other types of marketing messages from which you have not opted out. BECU will apply the opt out to the email address you used during the opt out process.

To learn about opting out of marketing SMS messages, please visit here at <https://marketing.becu.org/sms-terms-conditions>.



## **VI. HOW DOES BECU PROTECT PERSONAL INFORMATION?**

BECU is committed to maintaining the security of the personal information you entrust to us. We use technical, physical, and administrative safeguards designed to protect your personal information from unauthorized access and use. To learn more about our security practices, visit <https://www.becu.org/security/fraud-and-security-center>.

Our safeguards are designed to provide a level of security appropriate to the risk of processing your personal information. Our safeguards also include (as applicable) measures to ensure the ongoing confidentiality, integrity, availability, and resilience of processing systems, and a procedure for regularly testing, assessing and evaluating the effectiveness of technical and organizational measures for ensuring the security of the processing of personal information. Like any other organization, BECU cannot fully eliminate security risks associated with the processing of personal information.

You are responsible for maintaining the security of your account credentials. BECU will treat access to the BECU Services through your account credentials as authorized by you. If you provide your account credentials to any other person, BECU is not responsible for the unauthorized use or disclosure of your account by such persons, or for any information accessed through your account by such persons.

We may suspend your use of all or part of the BECU Services without notice if we suspect or detect any breach of security. If you believe that information you provided to BECU or your account is no longer secure, please [notify us immediately](#).

If we become aware of a breach that affects the security of your personal information, we will provide you with notice as required by applicable law. When permitted by applicable law, BECU will provide this notice to you through the email address associated with your account or other permitted method associated with your account.

**UNAUTHORIZED ACCESS TO PERSONAL INFORMATION AND THE BECU SERVICES – INCLUDING DATA SCRAPING – IS PROHIBITED AND MAY LEAD TO CRIMINAL PROSECUTION.**

## **VII. WHERE DOES BECU PROCESS PERSONAL INFORMATION?**

The BECU Services are intended for use only within the U.S. If you use BECU Services from outside the U.S., personal information you provide to us is transferred to and processed on our systems in the U.S. Other jurisdictions may have privacy laws that are different from (and, in some cases, less protective than) U.S. laws. We will handle the personal information you provide in accordance with this Privacy Notice.

## **VIII. WHEN DOES BECU UPDATE THIS PRIVACY NOTICE?**

From time to time, we may update this Privacy Notice in response to changing legal, technical, or business developments. When we update this Privacy Notice, we will post the updated version and change the “Last Updated” date in this Privacy Notice to the date of the update.

If we make material changes to this Privacy Notice, we will notify you in advance. We will ask that you consent to the updated Privacy Notice in the manner required by applicable privacy laws.





If you continue to use the BECU Services after we post the revised Privacy Notice and after the notice period (if any) ends, we will consider that you accept the revised Privacy Notice. If you do not accept the revised Privacy Notice, the prior version will apply to personal information collected before the *Last Updated* date and your ability to use the BECU Services may be limited.

Prior versions of this Privacy Notice are available upon request to [privacy@becu.org](mailto:privacy@becu.org).

## HOW TO CONTACT US

**Do you have questions about our Privacy Notice?** We love chatting with our members and other visitors. If you have questions or if you want clarification about any part of this Privacy Notice, please do not hesitate to contact us in any of the following ways:

### ***By Postal Mail:***

Privacy MS 1028-4  
P.O. Box 97050  
Seattle, Washington 98124

### ***By Phone:***

Business hours: Monday – Friday, 7 a.m. to 7 p.m. Pacific Time  
Saturday, 9 a.m. to 1 p.m. Pacific Time  
800-233-2328

<https://www.becu.org/support/contact-us>

### **[BECU.org](https://www.becu.org)**

Log in to Online Banking or the BECU App and send us a Secure Message.

## Appendix 1: Data Partners

### Data Collection Technology

Following are links to opt-out pages for certain of our data partners. Not all data partners offer opt-out pages so not all data partners are represented below. BECU will periodically update this information to reflect changes to our practices. Please reach out to [privacy@becu.org](mailto:privacy@becu.org) if you have questions.

Purpose	Data Collection Technology	Privacy
Analytics and Personalized Advertising	Google	<a href="#">Opt-out</a>
Personalized Advertising and Social Media	Facebook	<a href="#">Opt-out</a>
Analytics and Personalized Advertising	Amperity	<a href="#">Privacy policy</a>
Analytics and Personalized Advertising	Salesforce	<a href="#">Opt-out</a>
Site Operations	Live Person	<a href="#">Privacy policy</a>
Personalized Advertising	Snapchat	<a href="#">Opt-out</a>
Personalized Advertising	TradeDesk	<a href="#">Opt-out</a>
Analytics	Pinterest	<a href="#">Opt-out</a>
Social Media	LinkedIn	<a href="#">Privacy policy</a>

Following is supplemental information about certain of BECU's identity verification and fraud detection vendors. BECU shares personal information that BEUC collects from you with these vendors as described in this Privacy Notice.

#### **LexisNexis®**

BECU uses certain data services offered by LexisNexis® for business and individual identity verification. BECU shares contact data and government issued identifiers for this purpose, subject to our agreement with LexisNexis. For more information, please see <http://www.lexisnexis.com/privacy/data-privacy-principles.aspx>.

#### **Middesk, Inc. (Middesk)**

BECU uses Middesk's services for business background checks to verify information, such as tax ID and name verification, state filing and website validation. Middesk collects and analyzes data relating to BECU's use of Middesk's services, including search input data and data derived therefrom, to improve and enhance Middesk's services and for other development, diagnostic and corrective purposes in connection with Middesk's services. Middesk also may disclose this data solely in aggregate or other de-identified form in connection with its business operations.

#### **Onfido, Inc. (Onfido)**

Onfido collects and compares an image of your face with the image in your identity documents (e.g., passport photo) to determine the likelihood that they match. Before BECU captures or uploads to Onfido any Image, BECU will ask you for your consent to the processing of your Images for the purposes of performing identity verification. Please also see the [Onfido Facial Scan and Voice Recording Policy](#), Onfido Privacy Policy available at <https://onfido.com/privacy/>



and Onfido Terms of Service available at <https://onfido.com/terms-of-service/>. (See also Section III.2 above.)

**Pindrop Security, Inc. (Pindrop)**

On behalf of BECU, Pindrop collects, monitors, and tracks voice data, telephone number and type, timestamp, duration, location of device (from carrier) and geography metadata. Pindrop also aggregates and uses this data for its own purposes to improve its fraud detection services. (See also Section III.2 above.)

**SentiLink, Inc. (Sentilink)**

SentiLink uses data derived from or part of the data that you or we shared with SentiLink solely for purposes of providing its services, and analyzing, operating and improving its fraud detection and prevention services and incorporating the data into SentiLink's proprietary fraud prevention algorithms and models and fraud prevention services. SentiLink also creates information that is unidentifiable to any person or entity and not capable of being back-derived by an expert in the field using industry knowledge and available data-analytic tools and techniques (collectively, "**Depersonalized Information**") and uses the Depersonalized Information in a data set comprising both Depersonalized Information from BECU's data and the Depersonalized Information derived from other SentiLink customers.