

Global Credit Union Privacy Notice

About this notice

This Privacy Notice (“**Notice**”) describes how Global Federal Credit Union and its subsidiaries (“**Global**,” “**we**,” “**us**,” or “**our**”) collect, use, disclose, and otherwise process personal information collected through our websites, mobile applications, and other products, services, and interactions with Global (collectively, “**Services**”), when such Services link to this Notice.

Residents of California should review our “[Additional Privacy Disclosures for California Residents](#)” section for additional information about our information practices and California privacy rights, including the right to opt out of sales and sharing of personal information, as required by California law. Individuals located in the European Union should review our [European Union Privacy Notice](#), and residents of China should review our [China Privacy Notice](#). U.S. residents who are our customers, or who are applying to become customers for personal, family, or household purposes, should review our [U.S. Privacy Notice](#).

Personal information we collect

Global may collect the following types of personal information about you based on your interactions with us, your use of our Services, and your choices. We may obtain personal information from various sources, including directly from you, automatically through tracking technologies, and from our vendors and partners. The personal information we collect depends on how you interact with us and may not include every example listed below.

- » **Personal identifiers**, such as name, username, date of birth, state and federal government ID numbers, social security number, and unique identifiers that we associate with you.
- » **Contact information**, such as phone number, email address, and postal address.
- » **Financial information**, such as financial account, debit card and credit card number, and information about your financial history and transactions.
- » **Demographic information**, such as age, citizenship status, marital or family status (including whether your family includes children), languages spoken, education information, gender, employment information, or other demographic information.
- » **Preferences**, such as your preferred communication method, language, and time zone.
- » **Online and technical information**, such as operating system, browser version, device capabilities, and IP address.
- » **Geolocation data**, such as information we derive from your IP address.
- » **Usage information**, such as pages visited, length of time spent visiting individual pages, and patterns of site visits.
- » **Communications information**, such as records of your communications, customer service requests, website chats, and messages including read-receipts and measurement of click-through in messages.

How we use personal information

We may use or otherwise process the personal information described above for the following purposes:

- » **Business operations**, such as providing our Services; maintaining and servicing accounts; providing customer service; verifying customer information; processing payments; improving our services; fulfilling your requests; managing our relationships with our customers, partners, service providers, and vendors; and fulfilling purposes that we describe to you at the time we collect your personal information.
- » **Services operations and improvement**, such as maintaining, operating, optimizing, and providing access to our Services; identifying visitors to our Services; customizing content; monitoring and analyzing usage and trends on the Services; evaluating how our Services perform; repairing or improving the quality of our Services; tracking and responding to quality and security issues; debugging our Services to identify and repair errors that impair existing or intended functionality; developing new or enhanced products and offerings; and ensuring our Services operate effectively.
- » **Communications**, such as responding to your feedback or questions, confirming your preferences, providing you with information about our Services, contacting you about our Services, understanding how you interact with our communications, and improving the relevance and usefulness of communications.
- » **Advertising and marketing**, such as sending you promotional materials, delivering advertisements and marketing content, measuring the effectiveness of our advertisements and marketing activities, and developing insights to improve our Services and provide our users with enhanced features and functionalities.
- » **Security**, such as protecting our Services from cyber risks; authenticating users; enforcing our policies and terms; protecting our rights; fulfilling our legal obligations; preventing, identifying, investigating, and responding to fraud, illegal, or malicious activities, and other activity that violates or may violate applicable laws, regulations, legal process, or our policies; and generally safeguarding our Services.
- » **Legal and compliance**, such as managing risks, investigations, reporting, and other compliance activities; detecting potentially fraudulent transactions; responding to court orders or other government and law enforcement mandates or requests; identifying or managing legal actions related to our or others' rights or property; supporting actual or threatened claims, defenses, or declarations in a case or before any jurisdictional and/or administrative authority, arbitration, or mediation panel; and enforcing compliance with applicable laws, regulations, or legal processes as well as industry standards and our policies.
- » **Corporate restructuring**, such as evaluating or executing a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all our assets, as part of regular business operations or pursuant to a bankruptcy, liquidation, or similar proceeding.

How we disclose personal information

We may disclose personal information for the purposes described above to the following parties:

- » **Our affiliates and subsidiaries** for our business purposes.
- » **Agents, vendors, and service providers** so that they may provide their services to us and help us operate our business, including operating and maintaining our Services; providing product and customer promotional support; managing customer accounts; delivering services and communications; administering loans and other financial products; providing technical support; processing payments; and otherwise helping us operate our business.
- » **AdTech companies** so that they may provide us with marketing and advertising services.
- » **Law enforcement agencies, courts, regulatory agencies, other government entities, professional advisors, affected parties, and other external parties** in response to subpoenas, warrants, or court orders; for law enforcement or public safety purposes; in connection with any legal process; to investigate, prevent, or take action regarding possible illegal activities, fraud, safety of person or property, or a violation of our policies; to comply with laws, regulations, or other legal obligations; to protect and defend our rights and property or the rights and property of other parties; or to enforce our Terms of Use, this Notice, or agreements with third parties.
- » **Prospective or actual purchasers, investors, or successor entities, and other parties to corporate transactions** in connection with a contemplated or an actual reorganization of our business, or in connection with financing, a sale, or other transaction involving the disposal of all or part of our business or assets. This may include processing for the purpose of permitting the due diligence required to determine whether to proceed with a transaction.

We may also disclose information about you, including personal information to other third parties, where we have provided specific notice to you or asked for your consent, as required by law.

Cookies and other similar tracking technologies

We and our vendors use cookies, web beacons, pixels, tags, and other similar technologies (collectively, “**Cookies**”) to collect information when you interact with our Services. These Cookies may collect information about your usage and activities (such as your IP address and device identifier, the browser you are using, length and time of visit and pages visited); geolocation data (to deliver content based on your location); and other details about how you interact with our Services (including clicks, cursor movement, scrolls, and keystroke activity).

This information is used by Global and our vendors for various purposes including to analyze usage and performance; track bugs and errors; operate and improve our Services; verify account credentials and enable logins; track sessions; prevent fraud and protect and secure our Services; personalize and improve your experiences; improve and measure our advertising campaigns; and provide you with more relevant content, advertisements, and offers on third-party websites and services.

We may use third-party analytics providers, including Google Analytics, to help us analyze how you use or interact with our Services. In some cases, we may integrate the analytics services we use with certain advertising services that are also made available by our analytics providers. For example, we integrate Google Analytics with the following Google advertising features: Remarketing with Google Analytics, Cross-Device Remarketing & Reporting, Google Analytics Demographics & Interest Reporting, and Google Display Network Impression Reporting.

You may disable or block Cookies through tools available as part of most commercial browsers, and in some instances blocked in the future by selecting certain settings. Browsers offer different functionalities and options, so you may need to set them separately. Your opt-out choice may apply only to the browser or device you are using when you opt out, so you should update your settings on each of your browsers and devices. Please note that if you disable all Cookies, some features of our Services may not function properly.

The following services or organizations offer tools that you can use to limit or opt out of Cookies:

- » **Google:** You can learn more about how Google collects and processes data in the [Google Privacy Policy](#). Information about Google Analytics’ current opt-outs for web is available [here](#). You can opt out of Google Analytics advertising features directly with Google through its Ads Settings, Ad Settings for mobile apps functionality, and through the NAI’s consumer opt-out mechanism available [here](#).
- » **Meta/Facebook:** To change your settings with Facebook, log into your Facebook account and navigate to the Privacy Center at facebook.com/privacy/center or review your Ad Preferences at facebook.com/adpreferences.
- » **Microsoft:** For information on how Microsoft collects or receives Personal Information to provide service through Microsoft Advertising, visit microsoft.com/en-us/privacy/privacystatement.
- » **Industry Groups:** Many advertising and analytics providers belong to industry groups that let you easily opt out of targeted ads, such as the Digital Advertising Alliance (“DAA”) or Network Advertising Initiative (“NAI”). You can opt out through the DAA by visiting optout.aboutads.info/ and you can opt out through the NAI by visiting the nai.org/how-to-opt-out.

Your browser may have settings that allow you to transmit a “Do Not Track” signal when you visit various websites or use online services. Global does not process “Do Not Track” directives your browser may send.

We do not control and are not responsible for the effectiveness of external parties’ opt out options or programs, or the accuracy of their statements regarding their programs.

We or our vendors may collect personal information about your online activities over time and across different devices and online properties when you use our Services.

Interactive tools and automated processing

We may engage vendors to provide certain interactive tools on our Services. Your use of these interactive tools is voluntary, and we may retain the information that you submit through these features. For example, we may offer an interactive chat tool on our Services to answer questions and for other customer service purposes. When you participate in the interactive chat, either with a virtual or live agent, the contents of the chat may be captured and kept as a transcript. By using these tools, you understand that our vendors may process the information obtained through the feature to provide the service on our behalf.

We and our vendors may process your information using artificial intelligence and other automated tools, (collectively, “**Automated Tools**”) to improve, develop, and deliver our Services, including to analyze how our Services are used and interacted with, process your personal information, facilitate your use of the Services, and safeguard our Services.

We use Automated Tools for many purposes, including:

- » Security and fraud prevention purposes, for example to detect spam, fraudulent use of debit and credit cards, and to maintain the security of our information systems.
- » Targeted marketing and advertising.
- » Lending purposes, for example to obtain and evaluate your credit score when you apply for a loan.
- » Evaluating eligibility for membership and for payment and deposit products, for example, to determine your initial eligibility for membership, as well as your initial and ongoing access to payment and deposit products

Please understand that, in some circumstances, these Automated Tools may provide inaccurate or incorrect information.

We will not use Automated Tools to subject you to decisions based solely on automated decision-making that have a significant impact on you without providing additional notice, as required by law. Where these decisions may have a legal or other similarly significant effect, they are subject to human review and human-led dispute resolution processes.

Links to other sites

The Services may link to third-party websites with which Global has no contractual relationship. Global is not responsible for the content, security, or privacy practices of sites it does not control. Please refer to the privacy and security policies of these sites to learn more.

How Global protects personal information

We take reasonable measures to protect personal information from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction. Nevertheless, transmission via the internet and online digital storage are not completely secure and we do not guarantee the security of your information collected through the Services.

Your rights and choices

To update your contact information, please visit a branch or call us at 800-525-9094. To opt out of push notifications from the app visit the Settings section of the app to manage notifications.

If you receive promotional emails from us, you may opt out by clicking the “Unsubscribe” link included in our emails. Please note that we may still send you administrative emails, even if you opt out of marketing emails.

Additional privacy disclosures for California residents

This section is provided pursuant to the California Consumer Privacy Act and its implementing regulations, as amended (the “CCPA”).

In the event of a conflict between any other Global policy, statement, or notice and this section, this section will prevail as to California Consumers’ rights under the CCPA.

This section applies to California Consumers that use our Services or interact with us in an individual or household capacity. Capitalized terms in this section have the same meaning as the matching terms defined in the CCPA.

Unless otherwise noted, the disclosures contained within this section describe our current practices and our practices during the preceding 12 months.

Collection, Use, and Disclosure of Personal Information

Depending on the nature of your interactions with us, we and our vendors may have Collected the categories of Personal Information about you described in the chart below.

Categories of Personal Information Collected	Business Purposes for Collection, Use, and Disclosure
Identifiers , such as a real name, alias, mailing address, email address, account name, driver's license number and other government identifiers, or other unique personal identifiers.	» Business operations » Services operations and improvement » Communications » Advertising and marketing » Security » Legal and compliance
California Consumer Records, including any personal information described in subdivision (e) of Section 1798.80 of the California Civil Code , such as your name, signature, physical characteristics or description, address, telephone number, employment related information, financial information (i.e., bank account number, credit card number, debit card number, or any other similar information), or government identifiers (including social security number, driver's license, state identification card, or other government ID).	» Business operations » Services operations and improvement » Legal and compliance » Advertising and marketing
Characteristics of protected classifications under California or federal law , such as gender, veteran or military status, and age.	» Legal and compliance
Commercial information , such as transaction information and purchase history.	» Business operations » Services operations and improvement » Legal and compliance » Security » Advertising and marketing
Biometric information , such as voice recordings or behavioral characteristics.	» Services operations and improvement » Security
Internet or network activity information , such as IP address, device ID, browser type, browsing history, clickstream data, search history, access logs and other usage data related to your use of our Services.	» Services operations and improvement » Security » Communications » Advertising and marketing
Geolocation data , such as device location and IP address location.	» Security » Advertising and marketing
Audio, electronic, visual, and similar information , such as call and video recordings.	» Security » Services operations and improvement » Legal and compliance
Professional or employment-related information , such as work history and prior employer.	» Business operations » Legal and compliance
Education information , such as student records and directory information.	» Business operations » Legal and compliance

Inferences	» Advertising and marketing » Security » Legal and compliance
Categories of Sensitive Personal Information Collected	Business Purposes for Collection, Use, and Disclosure
Social Security, driver's license, state identification card, or passport number.	» Business operations » Security » Legal and compliance
Account access information , such as username, or financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.	» Business operations » Security » Legal and compliance
Precise geolocation	» Business operations » Security » Branch/ATM access controls
Racial or ethnic origin, religious or philosophical beliefs, or union membership.	» Legal and compliance
The contents of messages (such as letters, email, or text) except where we are the intended recipient of the communication.	» Communications » Legal and compliance
Biometric Information	» Service operations and improvement » Security » Legal and compliance

We may also use, disclose, and otherwise Process the categories of Personal Information listed in this chart to protect and defend our rights or property, operate our business, and comply with legal requirements.

As further described in the "How we disclose personal information" section of our Notice, we disclose Personal Information to other parties for the purposes described in the chart above. In accordance with these purposes, Personal Information may be disclosed to:

- » Our affiliates and subsidiaries
- » Vendors and agents working on our behalf
- » Service Providers that provide customer service offerings
- » Marketing, advertising and analytics providers
- » Other companies that we work with to offer Services to Consumers

In general, we may collect Personal Information from the following categories of sources:

- » Directly from you
- » From our affiliates
- » From Service Providers
- » From law enforcement agencies, courts, regulatory agencies and others
- » Advertising networks and marketing partners
- » From parties to corporate transactions

Sales and Sharing of Personal Information

This section describes the categories of Personal Information Sold to Third Parties (other than Sharing) or Shared with Third Parties for Cross-Context Behavioral Advertising in the preceding 12 months. We offer you the ability to opt out of these disclosures as set forth in the section “Rights of California Residents” or by visiting the “Your Privacy Choices” link in the footer of our website.

We may Sell and/or Share the following categories of Personal Information: Identifiers; Internet or network activity information; and Geolocation. We may Sell and/or Share these categories of Personal Information to or with: AdTech Companies (see the “Cookies and other similar tracking technologies” section for more information), and social media platforms (such as Facebook for creation of and advertising to custom audiences).

Retention

We retain the Personal Information described above for as long as necessary for the purposes described in this Notice or as otherwise authorized by law.

This generally means holding each category of Personal Information for as long as one of the following criteria applies:

- » Whether the Personal Information is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which we Collected the information;
- » Whether the Personal Information is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which the Personal Information was Collected;
- » Whether the Personal Information is reasonably required to protect or defend our rights or property (which will generally relate to applicable laws that limit actions in a particular case); or
- » Whether we are otherwise required or permitted to keep the Personal Information by applicable laws or regulations.

Where Personal Information is used for more than one purpose, we may retain it until the purpose with the latest period expires.

Rights of California residents

California Consumers have the following rights under the CCPA (subject to certain limitations):

- » **Right to know:** You have the right to request that we provide you with the following information:
 - o The specific pieces of Personal Information we have Collected and maintain about you.
 - o The categories of Personal Information we have Collected.
 - o The categories of sources from which we Collect Personal Information.
 - o The Business or Commercial Purpose for Collecting, Selling, or Sharing Personal Information.
 - o The categories of Personal Information we have disclosed about you for a Business Purpose and the categories of recipients to which it was disclosed.
 - o The categories of Personal Information we Sold or Shared about you and the categories of Third Parties to which each category of Personal Information was Sold or Shared.
- » **Right to correct:** You have the right to request correction of inaccurate Personal Information. We may request documentation from you in connection with your request.
- » **Right to delete:** You have the right to request deletion of your Personal Information, under certain circumstances and subject to certain exceptions.
- » **Right to limit use of your sensitive personal information.** California residents also have the right to direct us to limit certain uses and disclosures of their Sensitive Personal Information, which go beyond those specifically authorized pursuant to the CCPA. However, we do not use and disclose Sensitive Personal Information about California Consumers beyond these authorized purposes. As such, we do not offer this right.
- » **Rights to access and opt out of automated decision-making technology.** You have the right to request information about our use of Automated Decision-Making Technology and opt out of the use of Automated Decision-Making Technology if used to make a significant decision about you. However, we do not use Automated Decision-Making Technology to make significant decisions about California Consumers. As such, we do not offer this right.
- » **Right to opt out of sales and sharing.** You have the right to opt out of Selling and Sharing of your Personal Information. You may opt out of Sales or Sharing via Cookies through an opt-out preference signal (such as the [Global Privacy Control](#)) or through the “Your Privacy Choices” link in the footer of our website. You may opt out of non-Cookie based Sales and Sharing, please use our Privacy Portal [here](#). Note that if you come back to our website from a different device or use a different browser on the same device, you will need to opt out for that browser and device as well.

We will not discriminate against you for exercising your rights under the CCPA.

Submitting CCPA requests

To exercise your right to know, delete, or correct as described above, you or your authorized representative may submit a request by either:

- » Submitting a request via our [Privacy Portal](#); or
- » Calling our Member Service Center at 800-525-9094.

To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by clicking the “Your Privacy Choices” link in the footer of our website.

In some cases, we may request additional information in order to verify your request or where necessary to process your request. If we cannot verify your identity, we will be unable to process your request to know/access, correct, or delete. There may be certain circumstances where we cannot process your request. For example, if you request deletion, we may be unable to delete certain Personal Information needed to comply with our legal obligations or other permitted purposes. Before accepting a request from an agent, we will require that any authorized agents verify their authority to act on your behalf.

California Shine the Light Law

California’s “Shine the Light” law permits California residents to request certain information regarding our disclosure of personal information to third parties for their own direct marketing purposes.

We do not share personal information with third parties for their direct marketing purposes. If you are a California resident, you may request information about our compliance with Shine the Light by contacting us at memberservice@globalcu.org or by sending a letter to P.O. Box 196613, Anchorage, AK 99519-6613.

Any such request must include “California Shine the Light Privacy Rights Request” in the first line of the description and include your name, street address, city, state, and ZIP code. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through this email address or mail address.

As these rights and your CCPA rights are not the same and exist under different laws, you must exercise your rights under each law separately.

Privacy notice updates

Global may update this Notice from time to time. When this Notice is updated, the updated version will be posted on our website and the date displayed on the Notice will be revised. The Notice becomes effective when posted to our website.

Contact us

If you have any questions about this Notice, please contact us at memberservice@globalcu.org.