

FivePoint Credit Union - Youth Banking Privacy Policy

Revision 1.0 (10/27/2025)

Approved 10/27/2025

This Youth Banking Privacy Policy ("Privacy Policy") describes the data practices of FivePoint Credit Union ("FivePoint," "Credit Union," "we," "our," or "us") related to our Youth Banking Mobile Application (our "App"). "You" and "your" mean the parent or guardian of a child who downloads or utilizes our App or allows the child to download or utilize our App. Any questions regarding this Privacy Policy should be directed to our contact information at the end. The following discloses our information gathering, use and sharing related to our App.

To the extent permissible under applicable law, by use of our App you consent to this Privacy Policy and the collection, use and disclosure of personal information and data as described in this Privacy Policy. "Personal Information" is defined as information that you provide to us that reasonably identifies you, or certain individually identifiable information that is protected by law. You may exercise certain rights or choices concerning your personal information, as described below.

If you are a parent or guardian consenting to or otherwise allowing your child to download and/or utilize our App, you consent to this Privacy Policy on behalf of your child. This Privacy Policy specifically describes data collection about children in the section below titled "Children's Privacy" and parent rights under the Children's Online Privacy Protection Act ("COPPA") in the section titled "Parental Rights".

IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, DO NOT USE OUR APP.

This Privacy Policy includes, to the extent applicable, the Credit Union Privacy Policy on our website.

Information Collected and Received

The Credit Union generally collects a standard set of information related to each category of people who interact with us through our App, including personal information and other data described below, as well as any additional or unusual information that you choose to provide.

The information we collect may include personal data, such as your name, contact information, birth date, social security number, employment history, IP addresses, mobile device ID number, location, mobile device details (such as model, manufacturer, and version of your operating system), usage of our App, your financial data and history, non-public personal information as defined under the Gramm-Leach-Bliley Act, and other data that may identify you.

We may collect personal data about you at several different points, including but not limited to the following:

- when you install, interact with or otherwise utilize our App.
- when you engage in transactions, such as applications, payments, and transactions.
- when you enroll in any newsletter or other periodic communication.
- when you contact us for help.
- when we capture analytics data or receive error reports.
- when you choose to provide materials or information.
- when disclosed to you at or before the time of collection; and
- as described below in the sections titled "Children's Privacy" and "Parental Rights".

Information that we receive may be automatically or manually collected by us, our third-party service providers, or others, including information that is volunteered by you. Your interactions with third parties, such as social media companies, may be governed by different or additional terms or information collection.

Through your use of our App, we may also collect data via third-party libraries, SDKs or web view. Apple frameworks or services may also be used for data collection, such as App Analytics.

If you choose to withhold any information we request or collect, it may not be possible for us to provide the services or otherwise help you.

How We Use Your Information

The Credit Union, or its third-party service providers, may use your information for purposes described in this Privacy Policy or otherwise disclosed to you on or in connection with your use of our App. For example, we may use your information to:

- open and manage your accounts.
- process deposits, withdrawals and other transactions.
- provide statements and account information or send alerts.
- deliver the products, services or information that you have requested.
- manage our relationship with you, including but not limited to confirming your identity, and providing support.
- perform analysis about you, your actions, our customers or our services.

- communicate with you for any reason, including but not limited to push notifications.
- manage our business, such as by use in advertising/marketing, or use to improve and expand the services, to the extent permitted by applicable law.
- conduct business (M&A) transactions, such as the purchase by us of another business or a sale of all or substantially all of our business or assets, which includes the sharing, sale, assignment or other transfer of our or your data in connection with such transactions.
- take legal or other similar actions, such as acts required by law, requested by government organizations, and those prudent to fight actual or suspected fraud or illegal activities, and
- perform other actions described at the time of collecting the data or at the beginning of the relationship such as in our member agreement.

How We Share Your Information

The Credit Union may share your personal information with third parties in accordance with the practices set forth in our Credit Union U.S. Consumer Privacy Notice. We do not and will not sell your personal information. We may use or share information to enhance your experience with our App or our other services, such as our website, other mobile applications, and our online products and services; to help deliver our ads on your web browser, and to measure advertising campaign effectiveness. We may also share your information as required to meet legal and regulatory obligations.

In addition, we may share aggregated, anonymized non-personal information with third parties. Such information does not identify you individually.

You may have authorized some third-party companies to access your personal information and Credit Union account data in order for those companies to offer financial information and services such as making payments via a website or mobile application. In addition, you may have allowed those third-party companies to use your Credit Union account sign-in credentials in order to provide their services. Please note that some of these third-party companies may use other companies to assist them with providing services or with accessing your personal information or account data. The Credit Union is not responsible for the use or disclosure of any personal information or account data accessed by or on behalf of any company or person to whom you provide your Credit Union sign-in credentials, personal information or account information, and we do not control the privacy, security, or accuracy of your information that may be held by these third-party companies. We are also not responsible for any fees associated with these third-party services.

When you provide your sign-in credentials to your Credit Union accounts to a third party, you will be deemed by us to have authorized all transactions or actions initiated by that third party using the access information you provided, whether or not you are aware of the specific transaction or action, subject to any applicable law. Additional information on our banking terms and conditions can be found in the End User Agreement located in the disclosure section of the mobile app. You can also request a copy by contacting us directly at (800) 825-8829.

Advertising and Analytics Services Provided by Others

We may allow others to provide analytics services and display advertisements for our services. These providers (for example, Google Analytics) may use cookies, web beacons, device identifiers, and other tracking technologies which collect information about your use of our services. This information may be used by us and others to determine the popularity of our services, deliver advertising and content targeted to your interests in the services and on other websites, apps, and other services, and to better understand your online activity.

You may opt out of interest-based advertising provided by participating ad servers through the Digital Advertising Alliance, the Network Advertising Initiative, or the European Interactive Digital Advertising Alliance. You can opt out of Google Analytics by visiting <https://tools.google.com/dlpage/gaoptout>. You can also check your mobile device for settings that control advertising based on your interactions with the applications on your device.

Additional information can be found here: <https://www.networkadvertising.org/mobile-choice>.

How We Store and Process Your Information, International Transfers

The Credit Union stores, processes and maintains files that you create and/or upload using our App (as well as previous versions of your files). The information collected by the Credit Union may be processed and/or stored in the United States or any other country in which the Credit Union or its third-party service providers maintain operations. United States law and laws of other countries may offer different privacy protections from the law in your local jurisdiction.

Security

The Credit Union uses industry-standard security technologies in connection with our App.

Cookies

A "cookie" is a string of information providing you a unique identifier that we store on your computer or mobile device. Your browser provides that unique identifier each time you submit a query to our App. We use cookies to, among other things, keep track of services you have used, record registration information, record your user preferences, keep you logged into our App, facilitate purchase procedures, and track pages you visit. Cookies help us understand how our App is being used and improve your user experience.

Most applications are set to accept cookies by default. However, you can remove or reject cookies. Please be aware that such action could affect the availability and functionality of our App.

Location Information

If you enable Global Positioning System (GPS) tracking or precise geolocation technology (latitude and longitude) where requested, you acknowledge and consent to the use of such technology. You have the right to reject the use of this technology by contacting the Credit Union; however, thereafter some or all features of the App may not be accessible to you.

Links

The Credit Union is not responsible for links to or from its site and any third-party sites or content.

Children's Privacy

Our App and other services we provide related to youth banking may involve the collection and maintenance of personal data about children under 13. Our App is operated by: FivePoint Credit Union, 3700 Skyline Dr, Nederland, TX 77627. Please contact us at MemberServices@5PointCU.org or by phone at 1800-825-8829 with any questions about the collection, use and sharing of children's personal data, and specifically the personal data of children under 13 years old, including requesting a list of our service providers acting as sub-processors.

The information that use of our App collects about children under 13, as well as other personal data of children related to youth banking, is the minimal personal data necessary for children to use our App and includes: name; email; password; phone number; IP address; cookie identifiers; geolocation; standard browser data such as pages visited, duration on each page, and productivity/idleness; analytics data; any personal data contained in messages; any information required in profiles; financial and purchase history; phone usage (in connection with data tracked by our App); any information provided in support requests; and other personal data as described in the section above titled "Information Collected and Received".

The information we may collect about children under 13, as well as other personal data of children, is or may be used for: opening and managing accounts, user verification, delivery and improvement of our App, transactional emails, customer support, user communication, fraud prevention; detection of security incidents; data analytics; response to legal inquiries; termination of accounts; or other usage disclosed

above in the section titled "How We Use Your Information". We may use non-personally identifiable information to improve our services and deliver better and more personalized services.

The information we collect about children under 13 is disclosed to: our affiliates, our third-party service providers and vendors, other authorized users or joint owners of the account (e.g., parent/guardian); our accountants, attorneys, regulators, auditors, or law enforcement agencies as required by law or in connection with child usage, others as necessary (based on the appropriate consent of the parent/legal guardian), and other cases as described above in the section titled "How We Share Your Information".

No child personal data is made available to the public by us without your consent or as disclosed in this Privacy Policy. Our App does not enable a child under 13 to make personal data publicly available.

The parent of a child under 13 can review or have deleted the personal data held by us and refuse to permit its further collection or use. A parent may do so by notifying us through any designated contact method we provide and/or notifying us through the contact information below.

Parental Rights

In addition to the information in the preceding section, in connection with children under the age of 13, parents (including legal guardians) have specific rights under the Children Online Privacy Protection Act (COPPA). These rights with respect to children under the age of 13 include:

- We give direct notice to parents and obtain verifiable parental consent, with limited exceptions, before collecting personal data online from children.
- We give parents the choice of consenting to the collection and internal use and sharing of a child's information as required by COPPA.
- We provide parents with access to their child's personal information to review and/or have the information deleted.
- We give parents the opportunity to prevent further use or online collection of a child's personal information as required by COPPA.
- We do not condition a child's participation in an online activity on the child providing more information than is reasonably necessary to participate in that activity.

When you agree to terms referencing this Privacy Policy, or consent to this Privacy Policy through use of our App, you expressly agree to the collection of personal data and other information as described herein and in accordance with applicable data protection laws.

Parents may have additional rights under federal, state and local laws concerning this data. Please contact us using the contact information below to exercise any such rights that apply to you.

To the extent not covered elsewhere, the Credit Union also collects personal data or other information about parents, including without limitation, name, contact information, account verification details, financial details, consent requirements, and other information reasonably necessary in connection with the services available through use of our App.

Your Access, Correction, Deletion and Other Privacy Rights

We retain personal information for as long as is required by law or in other cases (i) as long as our relationship with you or our member is active or (ii) otherwise for a period of time consistent with our data retention practices, which is at least as long as we need to fulfill the purposes for which we have initially collected it or any subsequent authorized use, unless otherwise required by law.

You may have the right to request access to, correct, delete, or restrict processing of, some of the information we retain.

You may also have the right to opt out of some processing such as email marketing, except for transactional correspondence. You may also opt-out of push notifications by turning them off in your device settings. You may have the ability to delete and disable cookies, and other tracking/recording tools (to learn more about cookies, clear gifs/web beacons and related technologies, you may wish to visit <http://www.allaboutcookies.org> and/or the Network Advertising Initiative's online resources, at <http://www.networkadvertising.org>).

You may also have the right to make a complaint to a relevant data protection regulator.

Your rights may be subject to certain limitations and conditions. We may be restricted from acting in certain cases, such as if we are not the controller (the organization with legal responsibility for making decisions) of your information.

If you need further assistance regarding your rights, wish to exercise a right or receive a disclosure provided by law that is not listed here, or to attempt to resolve a privacy issue prior to contacting regulators, please contact us using the contact information provided below.

Your California Privacy Rights

Our App does not currently respond to browser "Do Not Track" (DNT) signals or other mechanisms, except if required by applicable law. Third parties may collect personal information about your online activities over time and across sites when you use the App.

California Business and Professions Code Section 22581 permits California residents under the age of 18 to request and obtain removal of content or information you have publicly posted on our App. Such removal does not ensure complete or comprehensive removal of the content or information posted on our App.

To make any of these requests, please send an email to us at the contact information below.

In certain instances, the disclosures in our California Privacy Notice are applicable to all consumers who interact with us digitally, as we provide the same version of each software application to all consumers.

Amendments

The Credit Union may amend this Privacy Policy at any time by posting a new or revised policy with or without notice. We will seek to notify users via email or by a posted notice or other method if its usage will be materially different than was described to you at the time of its collection.

Successors and Assigns

This Privacy Policy inures to the benefit of successors and assigns of the Credit Union.

Contacts

If you have any questions about this Privacy Policy, the practices of or your dealings with the Credit Union, or to request access, changes or deletion to information we have about you, you can (i) send email to MemberServices@5PointCU.org (ii) call us at: (800) 825-8829 or (iii) write us at: Attn: Privacy, 3700 Skyline Dr, Nederland, TX 77627.

Implementation Responsibility

- VP Operations

Revision Log

Revision	Revision Date	Approval Date	Comments
1.0	10/27/2025	10/27/2025	• New policy to be reviewed by the Policy Committee