

OFFICIALS FEDERAL CREDIT UNION

PRIVACY POLICY

Effective Date: March 15, 2026

Officials Federal Credit Union (“OFCU,” “we,” “us,” or “our”) provides this Privacy Policy to inform you of our policies and procedures regarding the collection, use, protection, and disclosure of Personal Information received through your use of our website at <https://officialscu.com> and all related subdomains, applications, and services (collectively, the “Services”).

This Policy applies to individuals and businesses that register for, purchase, or use OFCU’s Services, including our platform, software, applications, APIs, and all related tools, features, and content provided by OFCU, including credit union services and related product lines, as made available from time to time. It also applies to prospective customers and visitors to our website.

OFCU’s Services are not directed to children under the age of 13, and we do not knowingly collect personal information from minors. Our Services are offered to both individual consumers and businesses across the United States.

1. Personal Information We Collect

For purposes of this Policy, “Personal Information” means any information relating to an identified or identifiable individual or business entity. We collect Personal Information from the sources described below.

A. Information You Provide Directly

We collect Personal Information when you register for an account, purchase or subscribe to Services, contact us for support, or otherwise communicate with us, including:

- Name and job title
- Business or organization name
- Email address
- Phone number (if voluntarily provided)
- Billing address and payment information (credit card or ACH details processed through our payment processors)
- Account login credentials
- Content you submit through the Services (messages, feedback, uploaded files)
- Communications with our customer support team

B. SMS Opt-In Information

If you voluntarily opt in to receive SMS communications from OFCU, we collect:

- Mobile phone number
- Consent timestamp and IP address at the time of opt-in
- The exact consent language presented to you
- Message interaction data (e.g., STOP and HELP replies)

SMS consent records are retained separately and are never shared with third parties for marketing purposes. See Section 5 for our full SMS Communications Policy.

C. Automatically Collected Information

When you visit our website or use our Services, we automatically collect certain technical and usage data through server logs, cookies, and similar technologies, including:

- IP address and approximate location (city/region level)
- Browser type and version
- Device type and operating system
- Pages visited, time on page, and referring URLs
- Date and time of access

D. Cookies & Third-Party Analytics

We use cookies and similar tracking technologies to improve your experience on our site and to understand how users interact with our Services. Specifically:

- We use Google Analytics (or similar tools) to analyze website traffic and usage patterns. Google Analytics may set cookies on your device and transmit data to Google's servers. You can opt out of Google Analytics tracking at <https://tools.google.com/dlpage/gaoptout>.
- We may use third-party cookies or pixels for advertising purposes, including to show you relevant advertisements on other platforms based on your visit to our site.

You can control cookie preferences through your browser settings or through any cookie consent tool we make available on our site. Note that disabling certain cookies may affect the functionality of the Services. We do not use third-party advertising tracking networks for behavioral advertising targeting based on sensitive personal data.

2. How We Use Personal Information

We use the Personal Information we collect to:

- Provide, operate, and improve our Services and product lines
- Process payments, manage subscriptions, and fulfill orders
- Create and manage user accounts
- Respond to inquiries and provide customer support
- Send transactional communications (account confirmations, invoices, service updates)
- Send marketing and promotional communications where you have provided consent or where permitted by law
- Send SMS communications where you have opted in (see Section 5)
- Analyze usage trends to enhance features and user experience
- Detect, prevent, and address fraud, security incidents, and technical issues
- Comply with applicable legal obligations

We do not sell, rent, or trade your Personal Information to third parties. We do not use customer data to develop, improve, or train generalized AI or machine learning models. Our use of third-party AI APIs (such as OpenAI) is governed by those providers' terms and does not involve sharing your identifiable personal data for model training purposes.

3. Children's Privacy

Our Services are not directed to children under the age of 13, and we do not knowingly collect Personal Information from children under 13. If you are a parent or guardian and believe your child has provided us with Personal Information, please contact us at help@officialscu.com and we will delete it promptly. For users between the ages of 13 and 18, we encourage parental guidance regarding use of our Services.

4. How We Share Personal Information

We do not sell your Personal Information. We may share it only in the following limited circumstances:

A. Service Providers

We share Personal Information with trusted vendors and service providers who help us operate our Services, including:

- Cloud infrastructure providers (e.g., AWS or equivalent hosting platform)
- GoHighLevel – our CRM and SMS/email communication platform
- Payment processors (for credit card and subscription billing)
- Analytics providers (e.g., Google Analytics)
- IT and security service providers

All service providers are bound by written agreements requiring them to maintain the confidentiality of your information and to use it only for the specific purpose of providing services to us.

B. Business Transfers

In the event of a merger, acquisition, reorganization, or sale of all or substantially all of OFCU's assets, Personal Information may be transferred as part of that transaction, subject to confidentiality obligations no less protective than those in this Policy. We will notify affected users by updating this Policy.

C. Legal Requirements

We may disclose Personal Information if required by law, regulation, court order, or valid legal process, or if we believe in good faith that disclosure is necessary to protect the rights, property, or safety of OFCU, our users, or the public.

D. With Your Consent

We may share your Personal Information with third parties when you have given us explicit consent to do so.

5. SMS Communications Policy

This section governs our text message program and is designed to comply with applicable federal law, including the Telephone Consumer Protection Act (TCPA), and carrier requirements for A2P 10DLC messaging.

A. How We Obtain Consent

We only send SMS messages to individuals who have explicitly opted in. Consent is obtained through a clearly labeled opt-in form that displays the following disclosure (or substantially similar language):

“By providing your mobile number and checking this box, you agree to receive text messages from Officials Federal Credit Union. regarding your account, subscription updates, customer support, informational updates, and promotional communications. Message frequency varies (typically 1–4 messages per month). Message and data rates may apply. Reply STOP to opt out at any time. Reply HELP for assistance. Consent is not a condition of purchase.”

Consent is recorded with a timestamp and the IP address of the user at the time of opt-in.

B. Types of Messages We Send

SMS messages sent through our program may include:

- Account creation and login notifications
- Subscription confirmations and renewal reminders
- Customer support responses
- Product updates and informational announcements
- Event and webinar reminders
- Promotional messages about new products, features, or offers (where separately consented)

C. Message Frequency & Rates

Message frequency varies and is typically 1–4 messages per month. Message and data rates may apply depending on your mobile carrier plan.

D. How to Opt Out

You may opt out of SMS communications at any time by replying STOP to any message. After opting out, you will receive a single confirmation message and no further SMS messages will be sent, except as required by law.

E. How to Get Help

Reply HELP to any message, or contact us at help@officialscu.com or at the address listed in Section 12 for assistance.

F. Carrier Disclaimer

Carriers are not liable for delayed or undelivered messages. Message delivery is subject to carrier network conditions.

G. No Sharing of SMS Opt-In Data

We do not share mobile phone numbers or SMS opt-in consent records with third parties or affiliates for marketing or promotional purposes. This prohibition applies regardless of any other data-sharing arrangements described in this Policy. SMS opt-in data may be shared only with

GoHighLevel, our SMS delivery platform, solely for the purpose of transmitting messages on our behalf. GoHighLevel is contractually prohibited from using that data for any other purpose.

6. Data Security

We implement reasonable administrative, technical, and physical safeguards to protect your Personal Information against unauthorized access, disclosure, alteration, or destruction. These measures include encrypted data transmission (HTTPS), access controls, and vendor security requirements.

No system is completely secure. In the event of a data breach affecting your Personal Information, we will notify affected users as required by applicable law.

7. Data Retention

We retain Personal Information for as long as necessary to fulfill the purposes described in this Policy, including to provide the Services, comply with legal obligations, resolve disputes, and enforce our agreements. When a retention period expires for a given category of data, we will delete or de-identify it.

SMS consent records are retained for a minimum of four (4) years to support compliance verification and dispute resolution, consistent with carrier and regulatory requirements.

You may request deletion of your Personal Information at any time by emailing help@officialscu.com. We will honor deletion requests subject to any applicable legal retention requirements.

8. Your Privacy Rights & Choices

California Residents (CCPA/CPRA)

California residents have the right to: (1) know what Personal Information we have collected, used, shared, or sold; (2) request deletion of their Personal Information; (3) correct inaccurate Personal Information; and (4) opt out of the sale or sharing of Personal Information. We do not sell Personal Information. We do not sell or share Personal Information for cross-context behavioral advertising. To exercise your rights, contact us at help@officialscu.com.

Other U.S. State Rights

Residents of states with applicable consumer privacy laws (including Virginia, Colorado, Connecticut, Texas, Utah, and others) may have similar rights to access, correct, delete, or opt out of certain processing of their Personal Information. We will honor valid requests consistent with applicable law.

Cookie Preferences

You may control the use of cookies through your browser settings or through any cookie preference tool we provide. You may also opt out of Google Analytics tracking at <https://tools.google.com/dlpage/gaoptout>. Note that opting out of certain cookies may affect the functionality of our Services.

Marketing Communications

You may unsubscribe from marketing emails at any time by clicking the unsubscribe link in any marketing email or by contacting us at help@officialscu.com. You may opt out of SMS communications by replying STOP to any message.

Account Information

You may update or correct your account information at any time by logging into your account or contacting us directly.

9. AI & Third-Party Technology Disclosure

OFCU is federal credit union. Our Services may incorporate third-party AI APIs and tools (such as those provided by OpenAI or similar providers) to power certain features. We do not use your Personal Information to train, develop, or improve generalized AI or machine learning models, whether our own or those of third parties.

When you interact with AI-powered features within our Services, inputs you provide may be transmitted to third-party AI providers solely to generate a response or output. Those providers are governed by their own terms of service and privacy policies. We encourage you to review them. We select AI providers that maintain commercially reasonable data protection standards and contractually restrict use of submitted data for model training.

Our Services may also integrate with or link to third-party platforms, services, or APIs. We are not responsible for the privacy practices of those third parties. Please review their privacy policies before sharing any Personal Information through those integrations.

10. Data Transfers

OFCU is based in the United States and our Services are currently offered to users in the United States only. All Personal Information we collect is processed and stored in the United States. If you access our Services from outside the United States in the future, please note that your information may be transferred to and processed in the United States, which may have different data protection laws than your country of residence.

11. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or other factors. When we make material changes, we will post the revised Policy on this page with an updated effective date and, where appropriate, notify you by email or through the Services. Your continued use of the Services after any changes constitutes your acceptance of the revised Policy.

12. Contact Us

If you have questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us:

Officials Federal Credit Union

help@officialscu.com