

Launch Credit Union Online Privacy Policy

I. INTRODUCTION

Launch Credit Union (hereinafter, "Launch Credit Union" or "LCU," "we," "us," or "our"), created this Online Privacy Policy (referred to as "policy") to explain its policy regarding the privacy and the protection of your information. This covers how Launch Credit Union manages information that you submit, and that we (or agents acting on our behalf) collect and receive on our sites, digital platforms, and other online channels, together with any other digital platforms and related mobile applications owned, operated, or controlled by us (referred to herein individually and collectively as the "Digital Platform") and related to your use of our web services and mobile applications (hereinafter collectively, "Services"). We provide our Digital Platform and our products and Services to you subject to the terms and conditions outlined in this policy.

BY VISITING THE DIGITAL PLATFORM OR UTILIZING SERVICES YOU ACKNOWLEDGE AND AGREE THAT YOU HAVE READ THIS POLICY AND AGREE TO THE COLLECTION, USE, AND OTHER PROCESSING OF YOUR INFORMATION IN ACCORDANCE WITH THE PRACTICES DESCRIBED IN THIS POLICY. IF YOU DO NOT AGREE TO ALL OF THE TERMS, CONDITIONS, AND PRACTICES SET FORTH HEREIN, DO NOT ACCESS THE DIGITAL PLATFORM OR SERVICES.

This policy may change from time to time without prior notice. Your continued use of the Digital Platform or use of the Services after we make changes is deemed to be acceptance of those changes.

II. INFORMATION COLLECTION AND USAGE

The types of information that we may collect depends on the sites you access (including social media sites) and the Services you are utilizing. We may collect the following types of information:

- Information we receive from you on applications, forms, and in other communications to us, including but not limited to, identification information such as name, street address, e-mail address(es), and phone number(s).
- Information pertaining to your transactions with us, our affiliates (if any), and others.
- Information obtained when verifying your registration when using our Services, including but not limited to, username, password, and secret questions and secret answers for resetting passwords.
- Information from your browser or mobile device, including but not limited to: Internet Protocol address, type of mobile device, mobile operating system, browser type, pages you visit and the information you request, and the date and time of your access.
- Information from e-mails or other communications sent to us by you.
- Information obtained using Tracking Technologies: As described further in Section V below, we use Tracking Technologies, such as pixel tags, cookies and similar tools, to enhance your experience on our website, analyze site usage, and provide tailored marketing communications. These technologies may collect information about your device, browsing behavior, and interactions with our content. . Information of this type may be combined with other sources of information for these purposes. This allows us to recognize your needs, continue to make improvements, and provide more personalized banking services.
 - Pixel tags: A pixel tag (also known as a web beacon, clear GIF, pixel, or tag) is an image or a small string of code that may be placed in an advertisement or email. It allows companies to set or read cookies or transfer information to their servers when you load a webpage or interact with online content. For example, we or our service providers may use pixel tags to determine whether you have interacted with a specific part of our Services, viewed a particular advertisement, or opened a specific email.
 - Cookies: We use cookies. Cookies are small files that are stored on your computer by your web browser. Cookies allow a website to recognize whether you have visited before and may store user preferences and other information. For example, cookies can be used to collect or store information about your use of our website during your current session and over time (including the pages you view and the files you download), your computer's operating system and browser type, your Internet service provider, your domain name and IP address, your general geographic location, the website that you visited before the website, and the link you used to leave the website. If you are concerned about having cookies on your

computer, you can set your browser to refuse all cookies or to indicate when a cookie is being set, allowing you to decide whether to accept it. You can also delete cookies from your computer. However, if you choose to block or delete cookies, certain features of our website may not operate correctly.

- Geolocation Information: We may periodically collect, transmit, and use geolocation information to enable features that prevent fraudulent card use and send alerts. Geolocation information can be monitored on a continuous basis in the background only while the Services are being used or not at all, depending on your selection. You can change your location permissions at any time in your device settings.
- We may also use third-party services (such as Google, Meta/Facebook, or other marketing partners) that place tracking pixels on our website to measure the effectiveness of our marketing efforts and deliver relevant ads to you on other websites and social media platforms.

Launch Credit Union uses the above-listed information for the following purposes:

- To complete transactions and provide the Services authorized by you.
- To notify you about changes, updates and other announcements related to the Service and our other products and services;
- To deliver targeted advertisements, promotional messages, notices, and other information related to the Service and your interests;
- To provide you with promotional messages and other information about products, events, and services;
- For general business purposes, including but not limited to, to diagnose problems with the Digital Platform or Services, to send you information about your account services, to notify you of new products or applications being released, to prevent fraud and unauthorized transactions, to verify your identity, to determine and confirm your transaction limits, to perform collections, to comply with laws and regulations, to protect the personal safety of a consumer or the public, to prevent and defend claims, to resolve disputes, to troubleshoot problems, to analyze our products and services, to enforce Terms and Conditions for our Services, to protect our rights and property, and to customize, measure, and improve our Services.
- To enhance your experience on our Digital Platform.
- Analyze Digital Platform usage.
- Provide tailored marketing communications.

III. INFORMATION SHARING AND DISCLOSURE

We may share your information in the following limited circumstances:

- When your consent is expressly provided or when you have requested us to share information about you with a third party.
- With companies that assist us in administering and bringing you our Services or in advertising to you. The information shared with these companies typically includes information to process transactions on your behalf, conduct our operations, follow your instructions as you authorize, or protect the security of our financial records. These companies may include credit, product development, and data processing vendors.
- With other financial institutions. The information shared with these financial institutions typically includes information to verify accounts, confirm transactions, and to coordinate and improve the Services provided to you.
- Information gathered using Tracking Technologies (defined below), web server log files and tracking code, and information we receive through the use of these Tracking Technologies to analyze the web user journey and provide a more personalized banking experience.
- For Legal Reasons. We will disclose your information, without your prior permission, if we have a good faith belief that such disclosure is necessary to:
 - meet any applicable law, regulation, legal process or other legal obligation or governmental request;
 - detect, investigate, and help prevent security, fraud or technical issues;

- protect the rights, property, or safety of the Credit Union, our Digital Platform users, members, employees, or others; and
- as part of a corporate transaction, such as a transfer of assets to or an acquisition by or merger with another entity.

Generally, we do not disclose your personal information to third parties except if you consent to such disclosure or as otherwise described in this policy. We may, but are under no obligation to, keep information we collect indefinitely.

IV. HOW WE PROTECT YOUR PERSONAL INFORMATION

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. Launch Credit Union regularly monitors and tests security systems, trains employees, and makes necessary enhancements that conform to industry standards. We utilize industry-standard encryption of potentially sensitive information while in transit to us. No security system is impenetrable. We cannot guarantee the security of our Digital Platform or databases, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet. We ask that you do your part by maintaining any usernames and passwords you use strictly confidential and connecting to us from secured locations. Information collected by our third-party vendors in providing products and services to you may be stored and accessed outside the United States and may continue to be retained by such vendors after you terminate your account with the Credit Union. You agree to hold the Credit Union harmless for losses, inaccuracies, data breaches, and rejection of any requests initiated by you.

V. COOKIES AND OTHER TRACKING TECHNOLOGIES

Generally, your email address and all other personal information is collected only when you voluntarily provide that data. However, every time you use a Digital Platform or our Services, we may automatically collect, and we may use, your cookies, web beacons, and other similar tracking technologies (collectively "Tracking Technologies") to collect "non-personal" information.

Cookies allow us to collect information such as browser type, time spent on the site, pages visited, language preferences, and your relationship with us. We use the information for security purposes, to facilitate navigation, to display information more effectively, to personalize/tailor your experience while engaging with us, and to recognize your device to allow your use of our online products and services. We collect statistical information about the usage of the Digital Platform in order to continually improve design and functionality, to monitor responses to our advertisements and content, to understand how account holders and visitors use the Digital Platform and to assist us with resolving questions regarding the Digital Platform. We also utilize cookies for advertising purposes and we use tracking technologies to collect and track information to improve and analyze our Digital Platform and to optimize paid media strategies.

Some of these Tracking Technologies may be placed by third party service providers to help determine the effectiveness of our advertising campaigns or email communications. The use of Tracking Technologies by third party service providers is within their control and not ours. We do not control their digital platforms or their policies and practices regarding your information, and you should be aware that different rules might apply to the collection, use, or disclosure of your information by third parties in connection with their advertisements or promotions and other sites you encounter on the Internet.

This policy does not cover any use of information that a third-party service provider may directly collect from you, and we do not undertake to confirm, investigate, or police their practices. Using these Tracking Technologies is a standard practice on the Internet. If you do not want a cookie placed on your computer, you may disable cookies altogether by setting your browser or third-party software to reject cookies. If you reject the cookie, you may be unable to use portions of our Digital Platform that require registration, some pages of our Digital Platform might not function properly, and your Digital Platform experience may not be capable of being tailored to you from visit to visit. Please consult your web browser's documentation for more information about how to turn cookies on and off for your browser. Cookies are placed on your computer, and therefore we neither store cookies nor forward them to any external parties.

VI. WEB BROWSER DO NOT TRACK SIGNALS

We currently do not respond to web browser "do not track" signals.

VII. MODIFYING YOUR PERSONAL INFORMATION

You may access and modify your personal information at any time by logging into your account via our digital banking platform and clicking the My Profile tab, or by using one of our mobile applications. If you request the deactivation or change of information, such information may be retained in our backup systems for a period of time due to technology restrictions or as a precaution against systems failures. Some information may be retained for longer periods as provided in this policy, as required by law, or otherwise pursuant to our records retention policies and procedures.

VIII. CHILDREN

No Digital Platform of ours is directed towards children under the age of thirteen, and we do not knowingly collect any personal information from children under the age of thirteen. If a child uses a Digital Platform to provide us with personal information, we ask that a parent or guardian send us a written request to the address listed below and we will promptly delete the child's information from our records. Additionally, if we determine on our own that we have received such information, our policy is to promptly delete such information. Additional limitations may apply to members. If you are a member, please refer to your Membership and Account Agreement.

IX. POLICY CHANGES

Launch Credit Union continuously works to improve Services. As our Services evolve, we may update or amend this policy. If we modify this policy, we will post it at the Launch Credit Union Website. The revised policy will be effective immediately at the time of posting, unless a later effective date is expressly stated therein. We will also revise the "Last updated" date stated below. It is your responsibility to periodically review this policy. Users are bound by any changes to this policy by using our Services after such changes have been first posted. If you do not agree to the new posted policy, your remedy is to discontinue use of our Digital Platform and Services.

X. CONTACT INFORMATION

If you have any questions regarding this policy, you may Contact Us through our digital banking platform or using the information provided below:

Launch Credit Union
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Merritt Island, FL 32592
1(800) 662-5257
mserv@launchcu.com
Website: www.launchcu.com

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