



## ONLINE PRIVACY PRACTICES POLICY

Effective 2/20/2024

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### WHAT DOES THIS POLICY COVER?

This Online Privacy Practices Policy describes how Spero Financial (“the Credit Union,” “we,” “us,” or “our”) collects information when you visit or use Spero Financial’s website: [www.spero.financial](http://www.spero.financial). It describes how we use and share such information and explains your privacy rights.

This policy does not apply to websites, mobile applications, or services of Spero Financial affiliates. It also does not apply to non-Spero companies, such as third-party websites to which we link online. Please review the privacy policies of other websites, mobile applications, and services you visit to understand their privacy practices.

To ensure adherence to this external site notification regulation, hard coding has been implemented into the site’s framework to automatically populate the disclaimer box if any link to an external site is embedded (i.e. any site URL other than [spero.financial](http://spero.financial)).

Our website is intended for a U.S. audience. “You” means an individual who visits our website and does not refer to a business or other entity or to individuals outside the U.S.

This policy applies to information we collect about individuals who seek, apply for, or obtain our financial products or services for personal, family, or household purposes.

### WHAT INFORMATION DO WE COLLECT?

When visiting the Spero Financial website, the Credit Union may collect, but is not limited to, the following information:

- Personal information submitted on applications or forms including your name, mailing address, email address, and phone number.
- Desktop or mobile device information, such as but not limited to your internet protocol (“IP Address”), device type, web browser, operating system, geolocation, and display/screen setting.
- Website interactions such as pages visited, average time spent on a page, search engine traffic referral information, and responses to advertisements.

### HOW DO WE USE THE INFORMATION WE COLLECT?

We may use the information collected through the website to respond to questions and/or inquiries, to provide updates regarding your accounts, products, and services, to deliver marketing communications, to personalize your interaction with the site, to share information about products or services you may be interested in, to collect data for product and service enhancements, and for website optimizations.

Additionally, we utilize marketing pixels on the website to track user behavior. These snippets of code allow us to gather information about the website visitor – how they browse, what types of ads they click on, etc. This data is used for the Credit Union’s business intelligence and marketing efforts such as to measure campaign performance, track conversions, and build an audience base. We regularly monitor federal and state regulation for new legislation regarding disclosing cookie collection upon visit to the site. Examples of pixels/tags that may be used, but are not limited to, are included below:

- **Google Analytics:** For tracking all usage behaviors of site, including session length, page views, referral sources, etc.
- **Google Site Tag:** For remarketing/retargeting through the Google Ad Network and AdWords

- **Google Optimize:** A/B testing application to determine the best paths of website users on any given page, journey or interaction
- **Facebook Universal Pixel:** For tracking, creating, and segmenting all visitors of the site into custom audiences for Facebook and/or Instagram Ads

The Credit Union may also use this information for online advertising purposes, such as the following:

- **Relationship-based Advertising:** We may use general member information to help determine targeted advertisements or offers to present to individuals.
- **Online Behavioral Advertising:** Using website behavior data, such as key words searched, websites browsed, etc., to present a targeted advertisement or offer to individuals.

## HOW DO WE SHARE COLLECTED INFORMATION?

We use and share information we collect from or about you in accordance with our [Privacy Notice](#).

We may employ third-party companies and individuals to help us administer our website, conduct surveys, perform data analysis, provide technical support, and assist in fulfillment of services. These third parties may have access to your personal information (PII) only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purposes.

## HOW DO WE INTERACT WITH YOU ONLINE?

### Online Advertising

Spero Financial contracts with advertising companies to advertise the Credit Union’s products and services on sites and mobile applications not affiliated with Spero Financial. Some of the Credit Union ads are based on geographic and online behavioral data that may be served using data collected by third-party providers. Ads served on the Credit Union’s behalf by these companies do not contain any personal identifiable information (PII).

### Email

You should refrain from sending any confidential or private information via unsecured email to Spero Financial. We’ll never ask you to send confidential information to us via an unsecured email, such as online banking credentials, account information, or a social security number. To ensure secure communication, please use the secure message feature within online banking.

From time to time, Spero Financial will send emails for solicitation purposes. If you prefer we not deliver marketing offers to you via email, you may opt out of these solicitations by clicking on the “Opt-Out” button at the bottom of a Spero Financial email.

Spero Financial utilizes third parties for joint marketing; including insurance companies, credit and debit card companies, and transaction reward program providers - many of which utilize email marketing to send offers on behalf of Spero Financial and their organization. If you prefer to no longer receive marketing offers from these parties, you may opt out of these solicitations by clicking on the “Opt-Out” button at the bottom of the email.

### Social Media

Spero Financial operates on various social media channels including, but not limited to, Facebook®, Twitter®, YouTube® and LinkedIn® which enable online engagement among users who have registered to use them. Any content you post on official Spero Financial managed social media pages, such as pictures, information, opinions, or any Personal Information that you make available to other participants on these social platforms, is subject to the Terms of Use and Privacy Policies of those respective platforms. Please refer to the individual privacy policies and terms and conditions of those channels to understand your rights and obligations about such content. In addition, please note that when visiting any official Spero Financial social media page, you are also subject to the Spero Financial Online Privacy Practices Policy.

### **Links to Other Sites**

Our website contains links to other sites that are not operated by us. If you click on a third-party link, you will receive a pop-up as an alert that you are leaving the Credit Union website and encourages you to read the external site's privacy and security policy, as it may differ from that of the Credit Union. We are not responsible for the privacy or security of these sites, including the accuracy, completeness, reliability, or suitability of their information.

### **Other Marketing**

You can also control your marketing preferences for direct mail and telemarketing by contacting our Member Solutions Center at 800-922-0446.

Please note that if you opt out of Spero Financial marketing communications, you may still receive transactional communications related to accounts and services, such as account alerts and account changes from Spero Financial.

### **HOW DO WE PROTECT CHILDREN?**

The Site is not directed to individuals under the age of thirteen (13), and we request that these individuals do not provide Personal Information through the Sites. We do not knowingly collect information from children without parental consent. Visit the Federal Trade Commission website for more information about the Children's Online Privacy Protection Act (COPPA).

### **HOW DOES SPERO PROTECT MY INFORMATION?**

Every effort has been made to ensure security of confidential information and the protection of website users, in addition to maintaining security measures with the requirements of federal and state regulations to prevent unauthorized access (both internal and external).

### **HOW WILL SPERO NOTIFY ME IF THIS POLICY IS UPDATED?**

Please review this policy periodically, referencing the effective date listed at the top of this page. If the policy is revised in a material way, we will provide conspicuous notice on our website when the change takes effect.