

Last updated: January 1, 2026.

#### 1. POLICY SCOPE

Wings Credit Union, Wings Credit Union doing business as ("d/b/a/") Ent Credit Union ("we," "us," "our" and "credit union"), strives to serve your needs and to protect your identity and any information we collect about you. Protecting your information is one of our most important priorities. This Online Privacy Policy ("Policy") covers your interactions with the credit union, its affiliates, and companies engaged by the credit union and its affiliates to render online services when you visit any mobile or online site or application that we own or control, including, but not limited to, our website and our mobile apps (collectively, the "Sites"). Other privacy policies may also apply in addition to the terms of this Policy. These include the <u>Privacy Policy</u>, which applies to all members and consumers as described in that notice. By interacting with the Sites, you consent to the data practices described in this Policy, including our use and disclosure of information about you in the manner described in this Policy.

# 2. POLICY UPDATES

The credit union may update this Policy from time to time. When we do, we will let you know by appropriate means, such as by updating the "Last Updated" date at the top of this Policy. Any changes to this Policy become effective when posted unless otherwise indicated. Your use of the Sites following these changes means you consent and accept the revised Policy.

### 3. GATHERING, USING, SHARING AND PROTECTING INFORMATION

We collect personal and non-personal information that you provide to us via applications, forms, surveys, or other online fields, such as:

- Your name
- E-mail address, mailing address and telephone or mobile numbers, or other contact information
- Demographic information such as postal code, age, gender, preferences, and interests
- Transactional information, including account numbers and information we receive from consumer reporting agencies
- Identifiers such as government issued identifiers (e.g., Social Security Number)

Collectively, the referenced information is "Personal Information." As with all other information you provide to Ent, our policy on sharing this information with third parties applies to digital transactions. See the <u>Privacy Policy</u> for information on our sharing practices.

We may use this information to:

- Create and manage your account(s)
- Verify your identification so you can access the Sites and conduct account transactions
- Respond to inquiries and complete your requests
- Provide account alerts
- Provide information to you about our products and services
- Personalize your experience by tailoring products and offers to you
- Send you surveys, sweepstakes and similar promotions

# 4. OTHER INFORMATION WE COLLECT AND HOW IT MAY BE USED

You may interact with us in a variety of ways, online, including through a mobile device. When you are interacting with us on the Sites, our servers collect other information using common industry methods, which include:



**Cookies** – cookies are pieces of data stored on your device. Browser cookies are assigned by a web server to the browser on your device. A "cookie" is stored on your local hard drive through the browser and contains a unique sequence of text for identification purposes. Cookies may also be stored on your mobile device. Cookies allow us to collect information such as browser type, time spent on the Sites, and pages visited.

We use cookies and information gathered through their use to make your experience with the credit union and the Sites more personalized based on the products and services you have with us and the Sites. We also use cookies for purposes such as maintaining continuity during an online session; gathering data about the use of our Sites; monitoring online promotions; and anti-fraud and information security purposes.

You can choose whether to accept cookies through your browser settings. If you decide not to accept cookies through your browser, you will not have access to many features that make your user experience more efficient, and some features of the Sites may not work properly. Please note, that you will need to manage your cookie settings for each device and browser that you use.

**IP Address** – your IP address is a number that is automatically assigned to your computer by your Internet Services Provider. An IP Address may be identified and logged automatically in our server log files whenever a user visits the Sites, along with the time of the visit and the page(s) that were visited. Collecting IP Addresses is standard practice and is done automatically by many websites and applications. We use IP Addresses for purposes such as calculating website usage levels, helping diagnose server problems and administering the Sites and to deliver personalized advertisements.

**Mobile Applications** – we may collect and/or track app usage data, such as the date and time the app on your device accesses our servers and what information and files have been downloaded to present through the app. We may also collect the physical location of your device by, for example, using cell tower or wireless local area network signals.

You may deny sharing your device's location, but, if you choose to deny such uses or sharing, we may not be able to provide you with the applicable personalized services and content.

**Additional Technologies** – we may also use additional technologies such as pixel or clear GIFS, web beacons, Flash objects or other technologies. These additional technologies may be used in connection with some Site pages, downloadable mobile applications, and HTML formatted messages to collect high-level anonymous, aggregate data to:

- Enable features on the digital platforms, such as Facebook, Twitter, Instagram, and LinkedIn
- Ensure the digital platforms are operating properly and to assist in preventing non-authorized users from accessing your information
- Continuously drive user experience and content improvements
- Analyze the success of our marketing and communication efforts

Please note that any content you post to social media platforms, such as Facebook, Twitter, Instagram, and LinkedIn, as well as any Personal Information that you otherwise make available to users, is subject to the applicable social media platform's terms of use and privacy policies. We recommend that you review this information carefully to better understand your rights and obligations regarding such content.

Google Analytics – we use Google Analytics to learn more about the types of users that visit the Sites and to help improve the Sites. Google Analytics is a web analytics service provided by Google Inc. ("Google"). Google Analytics provides us with certain data regarding the demographics of the users that visit the Sites. To provide this service, Google Analytics may collect certain information about you from your computer or other device, including by not limited to, information regarding your visit (such as the pages you visit and the length of your visit), information about your device, (such as your IP address), how you got to the Sites and other information about you. Google may transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. By using the Sites, you consent to the processing of data about you by Google in the manner and for the purposes set out above.



You can learn more about Google Analytics and how it collects and processes data (including how to control the information sent to Google) by visiting www.google.com/policies/privacy/partners/.

You can opt-out of Google Analytics by using the Google Analytics opt-out browser add-on, available at: https://tools.google.com/dlpage/gaoptout/.

### 5. USE

In addition to the uses described above, we use information for purposes as allowed by law such as: servicing; communicating with you; improving the Sites, products, or services; legal/compliance; risk control; information security; anti-fraud; marketing; personalizing the presentation of our products and services to you; tracking website usage, such as number of hits, pages visited, and the length of user sessions in order to evaluate the usefulness of our sites; and using read-receipt notifications in our email communications.

## **DATA SHARING**

Although the credit union does not share your Personal Information with nonaffiliated third-party companies except as provided by our <u>Privacy Policy</u>, we are aware you may choose to do so to use their services. For example, you may have authorized some third-party companies to access your Personal Information and account data to offer financial information and services such as: account aggregation (consolidating your financial account information from different sources), making payments via a website or mobile application, and tax preparation. Because these third-party companies have access to your Personal Information and account data and may use your account sign-in credentials to provide the service, we recommend you use caution when granting such access to third-party companies.

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. Any one or all these companies may be storing your Personal Information or account data. We are 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 or account information. We do not control the privacy, security, or accuracy of your information that may be held by these third-party companies, which are governed by the third-party's privacy policy and data security program, rather than this Policy, unless specifically stated otherwise. 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 you are aware of the specific transaction or action.

If you decide to revoke the access authority you previously gave to a third party, we strongly recommend you change your password to ensure the third party cannot continue to access your account. For security and other reasons, we reserve the right to block or disable third-party access to any account without notice.

## 6. PROTECTION

To protect Personal Information from unauthorized access and use, we use security measures that comply with applicable federal and state laws. These measures may include device safeguards and secured files and buildings, as well as oversight of our third-party service providers to ensure information remains confidential and secure.

## 7. MAKING SURE YOUR INFORMATION IS ACCURATE

Keeping your credit union account information up to date is very important. If your account information is inaccurate, incomplete, or not current, you can update it through Online Banking (if you are registered) or by calling us at 800-525-



9623, write to us at, Wings Credit Union, P.O. Box 15819, Colorado Springs, CO 80935-5819 or by visiting your local credit union service center.

### 8. CHILDREN'S ONLINE PRIVACY PROTECTION

The Sites are not designed to attract children under 13 years old, and we do not knowingly collect information or maintain information about children under 13 years old. For more information about the Children's Online Privacy Protection Act (COPPA), visit the FTC website at <a href="https://www.ftc.gov">www.ftc.gov</a>.

### **CONTACT US**

If you have questions or comments about this Policy, you may contact us by calling us at 719-574-1100 or 800-525-9623, write to us at Wings Credit Union, P.O. Box 15819, Colorado Springs, CO 80935-5819 or by visiting your local credit union service center.