

Children Privacy Policy

By law, parental consent is necessary prior to collecting, using or disclosing a child's personal information for anything other than responding to a specific request for service or contest entry originally initiated by the child. **PrimeWay** goes further than the law requires. We find that the best way to protect a child's privacy is simply not to collect, use, or disclose information beyond what is absolutely necessary to maintain and service the child's account and to allow participation in contests.

It is **PrimeWay's** policy that children's online privacy be strictly protected. To ensure your child's privacy and safety the following procedures are enforced:

The only instances in which information is collected from a child is in direct response to a request for account service, information requests initiated by the child, and contest entries.

When a request for service or contest entry is submitted, access to that information is limited to key personnel. If a child is requesting information or entering a contest online, the information is forwarded to the individual responsible for that activity. Personnel responsible for the activity or for providing information will be clearly identified on the web site at the time of the contest.

Third parties are never given access to a child's information, except as it pertains to maintaining and protecting their information. Any company selected to help protect your child's internet privacy would have access to only the minimum information necessary to complete their task. In addition they are bound by confidentiality agreements and must produce evidence of regular due diligence in enforcing strict privacy and security standards.

The minimum personal information necessary to conduct a contest or fill a request for information or service is all that will be collected from a child. **PrimeWay** will not condition a child's participation in an activity on the provision of personal information than is necessary to participate. That information will not encompass more than a child's name, address, telephone number, e-mail address, account number, and at times, age. (Age is sometimes necessary for tiered age group contests.) The child's address, telephone number, and email are used solely to contact the child in response to their request or in notifying winners. Any personal information collected is destroyed promptly after completing the request for information or services or at the conclusion of the contest. Requiring information beyond what is necessary for participation in an activity or to provide service is strictly prohibited. Any concerns regarding the information collected should be directed to: Joe Cantu, Chief Risk Officer, **PrimeWay**, P.O. Box 53088, Houston, TX 77052-3088, or via email at jcantu@primewayfcu.com or by phone at 713-799-6321.

Parents can request to see all information collected on a child at anytime. To obtain any records on your child contact Noble Stolhand, **PrimeWay** Contact Center Manager at P.O. Box 53088, Houston, TX, 77052-3088, or via email at Contact.Center@primewayfcu.com or by phone at 713-799-6200. For the protection of the child, parents will be required to show proof of identity before the information is released.

Parents can have any information regarding their child deleted and refuse further collection or use of the child's information for any reason at any time. To request removal of a child's information prior to the scheduled destroy date, simply mail or email your request to Frank Bucci, **PrimeWay** Marketing Director at P.O. Box 53088, Houston, TX, 77052-3088 or fbucci@primewayfcu.com.