

Kirtland Federal Credit Union

Children's Online Privacy Protection (COPPA) Policy

Effective 8.1.2026

At Kirtland Federal Credit Union ("Kirtland CU", "KFCU", "KCU", "Credit Union", "we", "our", "us"), we respect your privacy and the privacy of your minor children. We understand the importance of maintaining the security of your, and their, personal information. This Children's Online Privacy Protection Act Policy ("COPPA Policy", "Policy") only relates to the information we collect online through <https://www.kirtlandcu.org>, our online banking platform and mobile banking application (collectively, the "Sites"). We ask that you read this Policy carefully. By using any of the Sites, you consent to this Policy.

This Policy may be revised or modified at any time without notice to you, and any updates to this Policy will be posted on this page with the updated effective date appearing at the top of this page. Your use of the Site(s) following these changes means that you accept the revised Policy.

This policy outlined in this COPPA Policy is intended to supplement information in KCU's [Privacy Notice](#), and [Online Privacy Policy](#). We will use and share any information that we collect from or about you in accordance with those policies. Where the COPPA Policy conflicts with the Consumer Privacy Policy and Online Privacy Policy concerning information about a Child, the terms of this COPPA Privacy Policy will prevail over the Consumer Privacy Policy and Online Privacy Policy.

Kirtland Credit Union does not solicit or collect identifiable personal information directly from children. KCU does not enable children to make their personal information publicly available. From time to time, we do sponsor contests or ask for articles written by children or offer prizes. For these events, we do collect information, but we only do so if the child's parent or guardian has consented to our collecting or has directly submitted the information. The types of information we collect may include: a child's first name, age, videos, photographs and voice recordings, written articles, and drawings. We do not collect biometric identifiers, government-issued IDs, or other sensitive data. We display this information on our website or in KCU newsletters during the event and for a time thereafter; we may also use it to determine the winners of a contest.

KCU may collect information about a child under the age of 13 (minor) for the purpose of opening and maintaining savings and checking accounts from a parent or guardian joint owner. The information we collect about any minor will be limited to their name, address, phone number, e-mail, date of birth, social security number and any other applicable BSA (Bank Secrecy Act) required information, including identifying document information. We will not accept an application from a minor online unless accompanied by the verified consent to collect the minor's information by the minor's parent or legal guardian. Information we collect about a minor under

13 will not be shared with any third party except a KCU service provider who needs the information to process inquiries or transactions requested on the minor's KCU accounts or as required or permitted by law.

Parental/Guardian Rights

The parent or guardian joint owner can review the minor's information on file with KCU at any time and ask KCU to delete any information about their minor that is not required by law or regulation to provide and maintain the account. The parent or guardian also has the right to refuse to permit the further collection, retention, or use of their child's personal information. If a parent or guardian asks KCU to delete or stop collection, retention, or use of information about a minor that we need to provide and maintain the associated account, we will need to close the account. We maintain the privacy and security of information we collect about minors consistent with our privacy policies applicable to information we obtain about minors age 13 and up and adults.

Contact Us

If you are a parent or legal guardian and have questions, comments, or requests regarding this Children's Online Privacy Protection Policy, please contact us at:

**Kirtland Credit Union
PO Box 80570
Albuquerque, NM 87198
(505) 254-4369 or 1.800.880.5328
KirtlandCU.org**