Effective Date: November 5, 2026

1. Overview and Scope

Summit Credit Union ("we," "us," or "our") is committed to protecting children's privacy. This Children's Privacy Policy explains how we collect, use, disclose, retain, and protect personal information from children under 13 through our online and mobile services (the "Service").

This Policy applies when the Service is directed to children under 13 or when we have actual knowledge that we are collecting personal information online from a child under 13. The Children's Online Privacy Protection Act and its implementing rule ("COPPA") provide parents and legal guardians specific rights regarding this information.

2. Information We Collect

Depending on the services used, we may collect information necessary to establish, maintain, secure, and service the child's membership, accounts, and digital access. This information may include:

- Child's first and last name, date of birth, social security number, email or mailing address and telephone number;
- Online banking username and password;
- IP address, device identifier, or other technical information associated with using our Service.
- We may collect this information directly from the child, from a parent or guardian or automatically through the Service. We will not require a child to provide more personal information than is reasonably necessary to participate in the Service.

3. How We Use Children's Personal Information

We may use children's personal information to:

- Provide, operate, maintain, and personalize the Service.
- Create and manage a child's account or participation.
- Respond to requests and provide support.
- Enable activities, features, communications, or submissions requested by the child or parent.
- Protect the safety, security, and integrity of the Service and its users.
- Comply with legal obligations and enforce our terms.
- Use information for another purpose disclosed in the direct notice to the parent and covered by verifiable parental consent.

4. How We Share Children's Information

We may share children's personal information with legal or regulatory authorities, vendors and service providers that support our online and mobile services, including providers that assist with digital banking, identity verification, authentication, transaction processing, fraud prevention, security, records management, and account servicing.

We take reasonable steps designed to confirm that service providers receiving children's personal information can maintain the confidentiality, security, and integrity of that information. We do not sell children's personal information.

If Summit proposes to disclose a child's personal information to a third party in a manner that requires separate parental consent under COPPA, we will obtain that consent before the disclosure. A parent may consent to collection and use without consenting to disclosure to third parties, except where the disclosure is integral to the online service.

For additional information about our general online privacy practices, please see Summit's Privacy Notice.

5. Parental Notice and Verifiable Consent

Before collecting personal information online from a child, we provide the parent with a direct notice describing our practices and obtain verifiable parental consent, unless COPPA permits collection without prior consent. When parental consent is required, we will obtain a completed consent form signed by the child's parent or legal guardian before collecting the child's personal information online. We use information collected from a parent for consent solely for that purpose and retain it only as necessary.

Where COPPA allows limited collection without prior consent—for example, to obtain a parent's contact information to provide notice, respond once to a child's request, protect safety or security, or support the internal operations of the Service—we collect and use only the information permitted for that purpose and do not use it to contact the child for another purpose.

6. Parent or Legal Guardian Rights

A parent or legal guardian may contact us to:

- Review the personal information we have collected from the child.
- Request correction or deletion of the child's personal information.
- Refuse to permit further collection or use of the child's personal information.
- Revoke consent, including consent for disclosure to third parties.
- Ask what categories of personal information we collect, how we use it, and our disclosure practices.

To protect the child's privacy, we will take reasonable steps to verify the requester's identity and relationship to the child before granting access or acting on a request. We will not require disclosure of more information than reasonably necessary for verification. If a parent revokes consent or requests deletion, the child may no longer be able to use features that require the information.

7. Data Retention and Deletion

We retain children's personal information only for as long as reasonably necessary for the specific purpose for which it was collected in accordance with Summit Credit Union's Record Retention Schedule, including applicable retention periods for account, consent, digital banking, legal, and security records. When the applicable retention period expires and the information is no longer reasonably

necessary for the purpose collected, we securely delete the information using measures designed to protect against unauthorized access or use of the information.

8. Security and Confidentiality

We maintain reasonable administrative, technical, and physical safeguards designed to protect the confidentiality, security, and integrity of children's personal information. We maintain a written information security program appropriate to the sensitivity of the information and periodically assess and update our safeguards. We take reasonable steps to release children's personal information only to service providers and third parties capable of maintaining appropriate protections. For additional information about our general online privacy practices, please see Summit's Privacy Notice referenced above.

9. Changes to This Policy

We may update this Policy to reflect changes in our practices or legal requirements. We will post the updated Policy and revise the "Last Updated" date. If a change materially affects how we collect, use, or disclose a child's personal information, we will provide a new direct notice to the parent and obtain new verifiable parental consent when required.

10. Contact Us

To exercise parental rights or ask questions about this Policy, contact Summit Credit Union:

- **By Phone: 800-236-5560**
- **By Mail: Summit Credit Union, P.O. Box 8046, Madison, WI, 53708-8046**
- **By Secure Message: Summit Credit Union Online or Mobile Banking**
- **By Email: memberservice@summitcreditunion.com**