Vantage West Credit Union
CHILDREN'S PRIVACY POLICY

Effective Date: November 9, 2026

Vantage West Credit Union ("Vantage West") values and is committed to the privacy of children and of all its users. It is the policy of Vantage West to comply with all applicable laws, rule, and regulations related to the collection of information from children under the age of 13 ("child" or "children"), including the Children's Online Privacy Protection Act ("COPPA"). This Children's Privacy Policy ("Policy") contains important information about how we collect, use, and disclose the personal information we collect from children through our website, www.vantagewest.org and the Vantage West Online and Mobile Banking Platforms (the "Site") and the Super Launch online and mobile application, provided on our Site (the "Service"). This Policy applies to the information we collect from children to provide account services through our Site and Service.

Vantage West partners with a third-party provider, Super Launch, to provide the Service hosted through our Site. While providing this Service, Vantage West may encounter information, including personal information, from the participant child.

Vantage West will handle children's personal information as described in this Policy. Any personal information we collect about other users (e.g., teens and adults) will be treated in accordance with Vantage West's Privacy Policy ("Privacy Policy"). The use of our Site and any dispute over privacy, is subject to this Policy, the Privacy Policy, our Online Privacy Policy and our Membership and Account Agreement ("MAA") including its applicable limitations on damages and the resolution of disputes. Our MAA and Privacy Policy are incorporated by reference into this Policy.

This Policy is posted at the bottom of all pages within the Service and on our website at www.vantagewest.org/privacy-policy

Who Will Collect Information About Children?

Vantage West operates the Site and Service and will collect children's personal information as described in this Policy and our Privacy Policy. We can be contacted at:

Vantage West Credit Union
PO Box 15115
Tucson, AZ 85743
Ph: (520) 298-7882 or toll-free at (800) 888-7882

The Service is offered in conjunction with an outside third-party partner, Nuuvia. They will have access to the data provided by the participant child but are contractually obligated to not disclose the data to any other third party or unauthorized individuals. Vantage West may provide partners with aggregate or de-identified information about users.

What Information Do We Collect About Children and Why?

As described in further detail below, we collect some personal information from participant children so that we can track their utilization of the Service. **Data is retained to provide financial management services to the participant child.**

Vantage West only collects as much information about a participant child as is reasonably necessary to participate in the Service. We do not condition a child's participation on the disclosure of more personal information than is reasonably necessary.

How Is Information Collected?

As a parent, you create the account and provide information to register the participant child to utilize the Service. This includes registering the child's device. When registering the participant child, Vantage West will collect the mobile number they are using so that notifications can be sent from the child to the parent.

For children, Vantage West utilizes the participant child's date of birth to verify their age. Vantage West collects the participant child's name. In addition, we may collect information about the participant child directly from the child, as well as automatically through a participant child's use of our Site and Service.

Parents may opt to stop the collection of the participant child's information by the Site and Service at any time by contacting Vantage West at (520) 298-7882 or toll-free at (800) 888-7882. This will prevent the participant child from utilizing the Service. Upon termination of Service, all the participant child's data will be purged from the Service. However, Vantage West will retain records as required by applicable law and our record retention practices. Records will be deleted when retention requirements have been met.

Information We Collect Automatically

Vantage West may automatically collect the following information about a participant child's use of our Site or Service through cookies and other technologies:

- Domain name; browser type and operating system; web pages viewed; links clicked; buttons clicked; the length of time spent on our Site or Service; the length of time our solution was utilized; Google Analytics statistics; the referring URL, or the webpage that led the child to our Site or Service;
- Device name and model; operating system type, name, and version; and
- Activities within our Site or Service.

Vantage West may also collect IP address, push notification ID, device identifier or a similar unique identifier from users, including children, of our Site or Service. We only use such identifiers to support the internal operations of our Site or Service and we do not use such identifiers to collect information about children outside of our Site or Service.

Unique Identifiers. Vantage West only collects and uses unique identifiers, such as IP addresses, as necessary to operate our Site or Service, including to maintain or analyze their functioning; perform network communications; authenticate users or personalize content; and protect the security or integrity of users and our Site and Service. We never use unique identifiers to track users across third-party apps or websites.

Aggregate or De-identified Information. Vantage West may use aggregate or de-identified information about children for research, analysis, and similar purposes. When we do so, we remove names, e-mail addresses, contact information, and other personal identifiers. We may use aggregate or de-identified information for the following purposes:

- To better understand how users access and use our Site and Service;
- To improve our Site and Service and respond to user desires and preferences; and
- To conduct research or analysis, including research and analysis by third parties.

Other Information We Collect About Children

Vantage West collects information about the participant child's performance and activities on our Site or Service, including financial performance. This information is for internal use only and will not be disclosed to other entities. Vantage West does not use this information in personally identifiable form for our own commercial purposes. Before we analyze or use any activity data for our own commercial purposes, we de-identify and/or aggregate such information.

How We Use Children's Information

Vantage West uses personal information collected from participant children for the following purposes:

- To provide our Service; and
- To respond to member service and technical support issues and requests.

How We Share Children's Information

Vantage West does not share, sell, rent, or transfer children's personal information other than described in this section, and a child may not make his or her personal information public through our Service. In general, we may disclose the personal information that we collect about children to provide our Service, to comply with the law, and to protect Vantage West and other users of our Service.

Your Rights to Review, Delete, and Control Our Use of Children's Personal Information

At any time, parents have a right to review the information Vantage West has collected about their participant child, respectively, and require us to correct it or to delete it, and/or to tell us to stop collecting and using the child's information. To exercise these rights, you must contact us by phone at (520) 298-7882 or toll-free at (800) 888-7882. You will be required to authenticate yourself as the joint owner on the child's account to receive information about that child. Please note that copies of information may remain in cached or archived form on our systems after you request us to delete it. Parents may login to the Service at any time and review the information entered by their participant child.

Changes to This Policy

This Policy is current as of the Effective Date set forth above. We may change this Policy from time to time and will post the updated Policy in the Service and on our Site, at www.vantagewest.org/privacy-policy. If Vantage West makes any changes to this Policy that materially affects our practices with regard to the personal information we have previously collected from a child, we will provide you with notice of where to find changes on or with your periodic account statement.