

## Grow Financial Federal Credit Union Bugg Club Website Privacy Policy

This privacy policy outlines the steps Grow Financial Federal Credit Union has taken to protect the privacy of all our Bugg Club visitors and to answer any questions you may have in regards to the privacy of your children while they are visiting the Bugg Club website.

This privacy policy only applies to the information collected online at the Bugg Club website. If you would like to review the privacy policy for the general portions of the Grow Financial Federal Credit Union website ([www.growfinancial.org](http://www.growfinancial.org)), please [click here](#).

### A Note to Parents

Because many visitors to the Bugg Club website may be children, we take care that our content is appropriate for children. In addition, we employ special measures to help children protect their privacy while online.

### General Browsing

Grow Financial Federal Credit Union gathers navigational information about where you go on the Bugg Club website. Additional non-personally identifiable information (for example, domain type, browser version, service provider, IP address) may also be collected, which will provide us with information about the use of the Bugg Club website. For example, this information allows us to see which areas of the Bugg Club website are most visited and helps us improve the quality of your online experience.

### Collection of Personally Identifiable Information

The Bugg Club registration form is the only place on the Bugg Club website where we collect personally identifiable information. When a parent registers their child(ren) for the Bugg Club, we collect the child's Grow Financial Youth Savings account number, child's name, mailing address, parent's name, parent's e-mail address, and phone number. If a visitor under the age of 13 attempts to register for the Bugg Club, they will only be asked to provide their birth date and a parent's/guardian's e-mail address. Grow Financial Federal Credit Union will then send the parent/guardian an e-mail notice and request that the parent/guardian complete the registration for their child. Before the child is registered and can receive the benefits of the Bugg Club, the child's parent/guardian must first open a Grow Financial Youth Savings account in the child's name with the parent/guardian as a joint account holder by visiting any Grow Financial Federal Credit Union branch location. For branch locations near you, please [click here](#). Once the Grow Financial Youth Savings account has been opened, the parent/guardian may then register their child(ren) in the Bugg Club. The parent/guardian may register their child online through the registration form contained on the Bugg Club website. Whenever a parent/guardian completes the Bugg Club registration for their child online, Grow Financial Federal Credit Union may, at its discretion, contact the parent/guardian to confirm enrollment in the Bugg Club.

We respect the privacy of children, and do not and cannot collect any more personal information about children under 13 than is reasonably necessary to enable them to participate in the activities that we offer through the Bugg Club and Bugg Club website. The information provided by children under the age of 13 (birth date and parent's/guardian's e-mail address) is used only to send their parent/guardian an e-mail requesting the parent/guardian to consent to their child's registration by completing a Bugg Club registration form for their child. We do not retain any of the information (birth date and parent's/guardian's e-mail address) provided by children under the age of 13 after that e-mail is sent. In addition, if a parent registers their child for the Bugg Club, we respect a parent's right to have their child(ren) removed from the Bugg Club at any time. To do so, please send an e-mail to [buggclub@growfinancial.org](mailto:buggclub@growfinancial.org) with the child's Grow Financial Youth Savings account number, child's name, mailing address, and phone number along with your request for removal.

For parents/guardians who have completed their child's Bugg Club registration, they can review the personally identifiable information that they provided about their child online by e-mailing their request to [buggclub@growfinancial.org](mailto:buggclub@growfinancial.org)

### Use and Disclosure of Personal Information Collected Online

The personal information collected on the Bugg Club website is used to enroll a child's Grow Financial Federal Credit Union Youth Savings account in the Bugg Club. For example, we collect birth dates to ensure that no one under 13 is attempting to register without parental consent and to confirm eligibility for

the Bugg Club. The mailing address is collected so Grow Financial can send a Bugg Club Welcome Kit to the child, along with an annual birthday card until the child reaches 11 years of age. During the registration process the street address, city, state, and zip code information will be checked to ensure accuracy with the information contained on the child's Grow Financial Youth Savings account.

We may use third parties to help us provide services to you and your children, such as administering e-mails and processing mailings. If personally identifiable information (i.e. name, address, e-mail address) is provided to any of these third parties, we will require that such information be maintained by them in confidence and used only for the purpose it is provided. You should be aware that we may disclose specific information about you if necessary to do so by law or based on our good faith belief that it is necessary to conform or comply with the law or is necessary to protect the users of our website, the site, or the public.

### **Cookies**

Grow Financial Federal Credit Union uses a browser feature known as a cookie, which assigns a unique identification to your computer. The cookies are typically stored on your computer's hard drive and used by Grow Financial Federal Credit Union to help track your clicks as you navigate through the pages within the Bugg Club website.

### **Links**

For your convenience and enjoyment, the Bugg Club website may contain links to other websites. Grow Financial Federal Credit Union does not disclose any information received by Grow Financial Federal Credit Union to these other websites. We do not evaluate and are not responsible for the privacy practices or content of such websites. We would urge you to review the privacy policies on each link to ensure you are comfortable with their policies and practices. In addition, none of the links that appear on the Bugg Club website should be deemed to imply that Grow Financial Federal Credit Union endorses or has any affiliation with the linked websites.

### **Changes in Policy**

For children under the age of 13 for whom parents have given consent, Grow Financial Federal Credit Union will send a new notice and request for parental consent if there are material changes in the collection, use or disclosure practices affecting children under the age of 13. Otherwise, if elements of our Privacy Policy materially change, we will post the policy changes in our Bugg Club Privacy Policy on this website. If you are concerned about how your personal information is used, please visit our website often for this and other important announcements from Grow Financial Federal Credit Union.

### **Questions**

If you have any questions or concerns with respect to our Bugg Club Website Privacy Policy, please contact us at:

Grow Financial Federal Credit Union  
Marketing Department  
P.O. Box 89909  
Tampa, FL 33689

[buggclub@growfinancial.org](mailto:buggclub@growfinancial.org)

1.800.839.6328