

U.Plan Terms of Use

Your privacy is one of our top priorities. The following policies apply only to the use of this website. Information regarding our Privacy Policy for the MEFA U.Plan can be found [here](#).

We collect two basic types of information through your online communications relating to the U.Plan – personal information and anonymous information. We also collect location information in connection with our mobile applications.

"Personal information" refers to information that identifies (whether directly or indirectly) a particular individual, such as information you provide on our forms, surveys, applications or similar online fields. Examples may include your name, postal address, email address, telephone number, Social Security number, date of birth or account information.

"Anonymous information" means information that does not directly or indirectly identify, and cannot reasonably be used to identify, a particular individual. Examples may include information about your Internet browser, information collected through tracking technologies, demographic information that you provide to us (e.g., your household income) and aggregated or de-identified data.

"Location information" means information that may be collected by certain mobile applications that identifies your physical location.

2. How We Collect Your Information

We collect personal information from you or about you when you provide this information to us directly. For example, we may obtain personal information when you request information, products or services from us, register on our website or the website of one of our servicer providers (collectively, a "Website") or an application accessed through a Website, respond to surveys, contact customer support or otherwise interact with us. We may also receive

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information about you from other online and offline sources, such as public databases, social media platforms and other third parties.

In addition, we may collect information about your activity on a Website automatically using tracking technologies, such as cookies, and pixel tags.

If you submit any personal information relating to other people to us or to our service providers in connection with the U.Plan, you represent that you have the authority to do so and to permit us to use the information in accordance with this Policy and the U.Plan Privacy Policy.

3. How We Use Information That We Collect

We may use information that we collect in order to, among other things:

- Communicate with you about your accounts or transactions with us
- Send you important information regarding the U.Plan, changes to this Policy and the U.Plan Privacy Policy and/or other similar administrative information
- Consistent with local law, required disclosures, and choices and controls that may be available to you:
 - Send you offers and promotions for our products and services, or products and services that may be of interest to you;
 - Personalize content and experiences on the Website;
 - Verify your identity and/or location (or the identity or location of your authorized representative) for security, fraud prevention and other risk control purposes; and
- Optimize or improve our products and services
- Detect, investigate and prevent activities that may violate our policies or be illegal
- Comply with our legal and regulatory obligations
- Enforce our terms and conditions and otherwise protect our rights and operations

4. How We Share Information That We Collect

We will use and share any information we collect on this site from or about you in accordance with this Policy and the [MEFA U. Plan Privacy Policy](#). Please note that information that we receive through the Website or otherwise is subject to the Public Records Law, Massachusetts General Laws Chapter 66, Section 10, and accordingly we cannot ensure absolute privacy. Information that you provide to us through this Website or otherwise may be made available to members of the public upon request under that law. Although there is an exemption to that law’s disclosure requirements for “materials or data relating to a specifically named individual, the disclosure of which may constitute an unwarranted invasion of personal privacy”, there is no assurance that the requested disclosure under that law of any particular information about you would be considered “an unwarranted invasion of personal privacy” for purposes of such exemption.

5. Online Tracking and Advertising

We and certain service providers operating on our behalf collect information about your activity on the Website using tracking technologies, including:

- **Cookies.** Cookies are pieces of information that are stored directly on the device that you are using. They allow us to collect information such as the type of browser you are using, the amount of time you spend using the Website, the websites or applications you visit and the preferences you have set up for your accounts. We use this information for such purposes as to personalize your experience, enhance security, facilitate navigation, display material more efficiently, recognize the device that you are using to access the Website and understand how the Website is used. The Website does not use cookies that capture unencrypted personal information about you.

You can choose to have your device refuse to accept any cookies, and the majority of devices and browsers offer additional privacy settings for cookies. You do this through your browser settings. Each device and each browser is a little different, so look at your device Settings or your browser Help menu to learn the correct way to modify your cookies. If you turn cookies off, you will not have access to many features that make your user experience more efficient and some of the Website services and features will not function properly. Please note that you will need to manage your cookie settings for each device and browser that you use.

- **Pixel tags, web beacons, clear GIFs and other similar technologies.** These are typically small pieces of data that are embedded in images on the Website, our applications or certain e-mail communications. They may involve the transmission of information directly to us, to another party on our behalf or to another party in accordance with its privacy policy. We may use these technologies to bring together information we collect about you.
- **Location tracking on mobile devices.** Certain applications on mobile devices may transmit information to us about your location. We may use that information to improve the products and services we provide to you as well as improving our services generally in your area.

Information collected through tracking technologies is used for many purposes including, for example, to:

- Provide useful features to simplify your experience when you use or return to the Website
- Deliver relevant content based on your preferences, usage patterns and location
- Monitor and evaluate the use and operation of the Website
- Analyze traffic on the Website and on websites or mobile applications of third parties

Other technologies. We may use other technologies, such as the capture of screenshots while you are using the Website, to understand how you navigate and use the Website. This information helps us to better understand how the services, applications and features accessible through the Website are used and to improve them.

We may associate this tracking data with any personal information you provide, in which case we will treat it as personal information.

Do Not Track. There is no industry standard for how Do Not Track consumer browser settings should work on commercial websites. Due to the lack of such standards our Websites do not respond to Do Not Track consumer browser settings.

We use Google Analytics. Google Analytics uses cookies and other similar technologies, to collect information about use of the Website anonymously and report website trends, without identifying individual visitors. To learn more, including how to opt out, visit <https://tools.google.com/dlpage/gaoptout>.

Occasionally, you may encounter banner advertisements for our products and services on third-party websites and mobile applications. We use third-party advertising service providers to distribute our advertisements on websites and mobile applications where we have paid to advertise. These advertisements may use tracking technologies to capture information such as IP address, browser type and usage information in order to track the effectiveness of our advertising efforts. Such tracking technologies do not capture personal information about you, and our advertising service providers are prohibited from using any information collected except to track advertising effectiveness.

In addition, we may use advertising service providers such as Google, Yahoo and MSN to place advertisements for our accounts and services on websites not affiliated with us, and to help us determine which of our advertisements are most likely to be of interest to you using non-personal behavioral information. Advertisements placed by these service providers may use tracking technologies that allow monitoring of your responsiveness to such advertisements. We restrict access and collection of information by advertising service providers for purposes other than assisting us with our advertising efforts.

6. Other Information Collected Automatically

Browser or Device Information: Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version, and the name and version of the website or application you are using. We use this information to ensure that our Website, applications and features function properly.

Application Information: When you download and use an application, we and our service providers may track and collect usage data, such as the date and time the application on your device accesses our servers and what information and files have been downloaded to the application based on your device number.

IP Address: Your IP address is a number that is automatically assigned to your computer by your Internet Service Provider. An IP address may be identified and logged automatically in our server log files whenever a user accesses the Website, along with the time of the visit and the page(s) visited. Collecting IP addresses is standard practice and is done automatically by many websites, applications and other services. We use IP addresses for purposes such as calculating usage levels, helping diagnose server problems and administering the Website.

7. Linked Websites

The Website may include or contain links to third-party websites not controlled by MEFA. We encourage you to be aware when you leave our website and to read the privacy policies and terms of use of any such websites that may collect your personal information, as they will likely differ from those of the Website. MEFA does not guarantee and is not responsible for the privacy or security of these websites, including the accuracy, completeness or reliability of their information.

In addition, MEFA is not responsible for the information collection, use and disclosure practices (including the data security practices) of other organizations, such as Facebook, Apple, Google, Microsoft, BlackBerry or any other app developer or provider, social media platform provider, operating system provider, wireless service provider or device manufacturer.

8. Data Security

Your privacy is very important to MEFA and we are committed to protecting your personal information from unauthorized access or use. We will use reasonable organizational, physical, technical and administrative measures to protect personal information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us at info@mefa.org or by calling (800) 449-MEFA (6332).

9. Preventing Identity Theft

In order to help us protect your personal information, it is important that you always keep your account information safe. Never share your personal ID, password or PIN with anyone, under any circumstances.

Note that we will never **initiate** (unless otherwise stated for a specific product or service application), a request via email for your sensitive information (e.g., Social Security number, personal ID, password, PIN or account number). If you receive an email asking for your sensitive information, you should be suspicious of the request and promptly contact us to report the suspicious activity.

Please be aware, however, that in certain telephone and in-person transactions we may ask for your full Social Security number, account number or other information to verify your identity before conducting the transactions you have requested. For example, we may ask for such information to verify your identity when you place a call to us. We will never request that you disclose your personal ID, password or PIN under any circumstances, including such telephone or in-person transactions.

Additional information regarding identity theft and the steps you can take to help protect yourself from fraud can be found on the [Federal Trade Commission website](#).

10. Children's Privacy

We do not use the Website to knowingly solicit personal information from or market to children under the age of thirteen (13) without parental consent. We request that such individuals do not provide personal information through the Website. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should promptly contact us and we will delete such information from our files. For additional information regarding the Children's Online Privacy Protection Act (COPPA), please visit the [Federal Trade Commission website](#).

11. External Aggregation Services

You have the responsibility to help us protect your accounts by never revealing your user name, password, or other credentials to any person or third party. By providing your user name, password or other credentials to any person or third party (including an aggregation service) you authorize that person or third party to initiate transfers to or from your account.

Some third-party companies offer aggregation services that allow you to consolidate your financial account information from a variety of sources, such that you can view all your account information at a single online location. For

example, an aggregation service might collect and consolidate your checking and savings account balances at your bank, the value of your stocks and bonds in your brokerage account and your frequent flier mileage information from an airline. In order to do so, the aggregator may request access to personal information - including identification information, account information, personal IDs and passwords - from you for each individual website.

Please use caution when providing personal information to an aggregation service. By providing your user name, password or other credentials to an aggregation service you authorize that person or third party to initiate transfers to or from your account.

Should you decide to revoke the authority you have given to an aggregation service, you should notify the aggregation service in addition to contacting us, in which case we may need to block your account until we issue new access codes.

12. Social Media Platforms

MEFA may interact with registered users of various social media platforms, including Facebook® and Twitter®. Please note that any content you post to such social media platforms (e.g., pictures, information or opinions), as well as any personal information that you otherwise make available to users (e.g., your profile), is subject to the applicable social media platform's terms of use and privacy policies. We recommend that you review this information carefully in order to better understand your rights and obligations with regard to such content.

13. Retention Period

We will retain your personal information for the period necessary to fulfill the purposes outlined in these [Terms of Use], unless a longer retention period is required by law.

14. Changes to the Terms of Use and Online Privacy Policy

From time to time, we may make changes to these Terms of Use in order to accommodate new technologies, industry practices, regulatory requirements or for other purposes. We encourage you to review these Terms of Use periodically to ensure that you understand how we collect, use and share information through the Website. If we do make changes to these Terms of

Use, we will also update the "Effective Date" posted at the bottom of these Terms of Use.

Any changes to these Terms of Use will become effective when the revised Terms of Use are posted on the Website, relevant application or other online interface, as applicable. By continuing to use the Website following such changes, you are agreeing to accept the terms of the revised Terms of Use.

15. Contact Us

If you have any questions or comments about these Terms of Use or our privacy practices generally, we encourage you to contact us at info@mefa.org or by calling (800) 449-MEFA (6332).