
Policy 2124: PRIVACY POLICY

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INTERNATIONAL UAW FEDERAL CREDIT UNION

PRIVACY POLICY

International UAW Federal Credit Union (IUAWFCU) realizes that as a financial institution we have an affirmative duty and continuing obligation to respect the privacy of our members and to protect the security and confidentiality of our members' nonpublic person information. In response to the Gramm-Leach-Bliley Act and the NCUA Privacy Regulations, we have prepared the following privacy policy that will provide privacy disclosures, and, where required, will give our members the opportunity to opt-out of certain disclosures.

1. Information Collected

IUAWFCU will collect information necessary to provide our members products and services, or as required by law. IUAWFCU collects information about members and their account(s) from the following sources:

- From member applications or other forms (examples: name, address, social security number, income);
- Member transactions with the credit union or others (examples: account balance, payment history);
- Information we receive from a consumer reporting agency (examples: credit worthiness, credit history);
- Information obtained when verifying the information provided on applications or other forms that may be obtained from current or past employers, or from other institutions where financial transactions are conducted

2. Former Member Information

IUAWFCU will not share information about members who have terminated their relationship with the credit union, unless permitted or required by law to do so.

- Annual privacy notices will no longer be sent to those who have terminated their relationship with IUAWFCU.

3. Information Disclosed to Third Parties

In order to conduct the business of the credit union, we may disclose all of the information we collect, as described above, to companies that perform marketing or other services on our behalf or to other financial institutions with whom we have joint marketing agreements so that we may provide members competitive products and services. We may also disclose nonpublic personal information as permitted or

required by law. These disclosures typically include information to process transactions on the member's behalf, conduct the operations of our credit union, follow member's instructions as we are authorized, or protect the security of our financial records.

To protect our member's privacy, we only work with companies that agree to maintain strong confidentiality protections and limit the use of information we provide. We do not permit these companies to sell the information we provide to other third parties.

4. Contracts with Affiliates

Under both the Gramm-Leach-Bliley and the NCUA Privacy Regulations, IUAWFCU may share member information with affiliates of this credit union. The term "affiliate" means "any company that controls, is controlled by, or is under common control with another company." However, agreements in regards to keeping member information confidential have been addressed

5. Safeguarding Member Information

IUAWFCU will maintain security measures consistent with the requirements of federal and state regulations, including risk management systems designed to prevent unauthorized access, both internal and external, to member information.

IUAWFCU has procedures in place to protect member information systems in the event of a natural disaster or technical failure.

6. Credit Union Employees

IUAWFCU employees with access to member information will receive a copy of our privacy policy and will be notified of the importance of maintaining the confidentiality of member information. IUAWFCU restricts access to those employees who need to know that information in order to provide products or services to members. IUAWFCU maintains physical, electronic and procedural safeguards that comply with federal regulations to guard our members' nonpublic personal information.

IUAWFCU has established procedures to eliminate internal and external unauthorized access to member information.

IUAWFCU employees will be informed of and will have access to information regarding the proper procedures for filing reports to the appropriate regulatory and law enforcement agencies. IUAWFCU may conduct background checks on its employees to ensure compliance with our security program. IUAWFCU thoroughly investigates any allegations of employee misconduct and limits access to sensitive information to specific employees to ensure confidentiality of member information.

Individuals other than credit union employees, including board members and volunteers, may have limited access to member information. IUAWFCU has established confidentiality controls in order to protect improper access to, and distribution of, member information.

7. Third-Party Vendors

IUAWFCU has contracted with a service provider to install and/or maintain our member information system. IUAWFCU exercised due diligence in selecting our service provider to ensure that proper

security measures are in place to protect member information. IUAWFCU may regularly monitor service providers to ensure that they continue to satisfy their obligations.

8. Protection of Member Account Numbers

IUAWFCU will only share account numbers or access codes as authorized or required by law.

9. Nonmember Consumer Information

IUAWFCU does not provide services to nonmembers.

10. Joint Marketing Agreements

IUAWFCU may enter into joint marketing agreements to provide member information to nonaffiliated third parties to perform services for the credit union or functions on behalf of the credit union.

IUAWFCU includes language in these joint marketing agreements prohibiting third parties from using or disclosing member information for purposes other than in the ordinary course of business to carry out the purposes for which the information was provided.

