



# GGEFCU

## PRIVACY POLICY

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### Our Privacy Practice

As part of our commitment in maintaining your information privacy, the Board of Directors, management and staff have worked together to establish the following:

- Password controlled computer system which access is defined to the employee needs based on position description.
- Controls are in place limiting direct access to consumer/member information.
- Procedures restricting on how consumer/member information is handled and disclosed.
- A system that addresses how consumer/member information is collected, utilized, and maintained. (Please refer to The Collection And Usage Of Information section below)
- A procedure on how member information is updated.
- A requirement that third-party services (out-sourced) agreements and/or contracts include a clause, which restrict the usage of member information as specified on the agreement of the service.
- All employees and officials are required annually to acknowledge they have read the Fraud Prevention, Detection and Bank Bribery Policy.
- In addition, all Officials/volunteers are required as part of their oath of office review and sign the Conflict of Interest and Code of Ethics Policy.

Furthermore, we have identified specific requirements that are essential in order for the credit union to be successful in ensuring your information privacy maintained.

- We have established a training program to assist staff, management and officials in understanding the requirements of the regulation and improve their awareness in protecting member information.
- The credit union will provide its members and potential members a notice about its privacy practice when membership is established, annually, and at the request of the individual. Please note the annual privacy notice will be provided to the member with the 1st quarter statement or the statement period ending March 31 of each year.
- The credit union has identified the circumstance when member information may be released to nonaffiliated third parties which are in accordance with the exceptions noted in 12 CFR §§ 716.14 or 716.15 and are done in the ordinary course of business to carry out such purpose.
- The credit union automatically opt-out and does not disclose members non-public personal information to non-affiliated third parties, with the exception as allowed in 12 CFR §§ 716.14 and 716.15.

### The Collection and Usage of Information

In order for us to service your financial needs we must first establish a business relationship, for this reason it is important that we collect personal information about you. Based on our policy and procedures, information you provide is kept secure and confidential. In addition, we collect nonpublic personal information about you through:

- The information we received from signature cards, credit applications, and other forms you completed when you requested for or utilized a product or service of the credit union.
  - The transactions you conducted (e.g. deposits, withdrawals, payments, etc.).
- The information we received from a consumer reporting agency.

- As part of our commitment to you, the credit union will continue to be in compliance with this regulation, should you become an inactive member or choose to close your account(s).

This information collected and used is only for the purpose of developing quality products and services, in order to best serve our membership or as authorized in 12 CFR §§ 716.14 or 716.15. The staff, management and officials of GGEFCU have been trained to ensure strict confidentiality of consumer and member information is maintained. As part of our ongoing efforts to ensure the security and confidentiality of member information we look and review the availability of new technology to support these needs and as well as protect your privacy.