

PRIVACY POLICY AND AGREEMENT

[Complies with Requirements of the Gramm-Leach-Bliley Act of 1999 and NCUA's Regulation 12 CFR § 716]

Trust has always been the foundation of our relationship with our members. Because you trust us with your financial and other personal information, we are committed to respect your privacy and safeguard that information. To preserve your trust, we pledge to protect your privacy by adhering to the practices described below.

By signing any application or agreement with us, or your use or continued use of any of our services after receiving this document, you jointly and severally agree to the terms and conditions set forth in this Policy and Agreement.

- 1. The Types of Information We Collect.** We only collect information about our members for lawful business purposes, or as otherwise required by applicable law. We maintain strict security procedures to protect your information. We collect information about members from the following sources: (a) Information we receive from you on applications for services, verifications, current and past employers, other forms and any communications you send to us including electronic messages from which we collect your name, address, phone numbers, Social Security numbers, financial data, birth date, gender and other information; (b) Transactions involving your accounts or services with us from which we collect information such as your name, account number, balance, payment history, parties to your transactions and credit card usage; (c) Consumer Credit Reports from which we collect information regarding your creditworthiness, credit history and account activity; (d) Market Research Firms that provide us with a variety of information regarding our members such as the number of individuals in a household, home ownership; and (e) Certain information when you visit our website such as date and time our site was accessed, the web browser used and what pages were accessed.

You agree that the telephone numbers, mailing and e-mail addresses provided in your Membership Application and Signature Card, or any other application or communication sent to us are publicly available and will be used to provide notices, disclosures, statements, other communications (including, but not limited to, our responses to your email communications) and offers for certain products or services as explained in this Privacy Policy.

- 2. The Types of Information We Disclose.** We generally do not provide any non-public personal information about our members and former members, except as permitted by applicable law. However, we may disclose the non-public personal information we collect as described above to Financial Service Providers such as insurance agents, and other non-affiliated third parties as permitted by applicable law.

Because of the limited way we share information with non-affiliated third parties, we are not required to provide you with the opportunity to opt-out from the disclosure of information to Sharing Information with Credit Union Affiliates. Our affiliate, **Members Financial Services**[™], provides financial services, including financial planning, securities brokerage and insurance products and services. We may share personal information (such as name, address and account number) and account information (such as type of accounts, account balances and transaction history) with our affiliate so they can serve you more efficiently. Our affiliate maintains the same privacy standards as the Credit Union.

- 3. Security.** We are committed to taking every reasonable precaution to protect individual identifying information that you provide to us. We restrict access to non-public personal information about you to employees who need to know that information to provide products and services to you. We also maintain physical, electronic and procedural safeguards that comply with Federal Regulations to guard your non-public personal information.

Our Internet banking service providers, Database Management Services, Inc.®, HomeCU™, Jack Henry and Associates® and iPay Technologies, LLC™ have also developed security policies and procedures to protect the member information that they must collect and maintain to help us process your banking transactions over the Internet. They have developed top-of-the-line security systems to ensure your member information is protected on the Internet and within each respective provider's environment.

4. **Notices and "Joint Relationships"**. Except where expressly required by applicable law, we will provide all notices, including opt-out notifications if required, to the person (member) listed first on any application, agreement or other relevant document with us. The notice will be mailed to the address noted for said person on the application, agreement or other document. If this person (member) has agreed to receive notices and disclosures electronically, then we can send all such notices and notifications, including but not limited to, appropriate opt-out forms, to the email or Internet address provided by said person. All joint owners, borrowers and guarantors agree to the receipt and sufficiency of any notice or notification sent according to this paragraph.
5. **Modifications**. The Credit Union reserves the right to modify, change or amend this Privacy Policy and Agreement at any time without notice other than as expressly required by applicable law.
6. **What Members Can Do to Help**. Protect your account numbers, card numbers, PINs (personal identification numbers) and passwords. In particular, never keep your PIN with your debit card or credit card, as that makes you vulnerable in the event you lose your card or your card is stolen. Use caution in revealing account numbers, Social Security numbers, etc. to other persons. In particular, if a caller tells you he/she is calling you on behalf of the Credit Union and asks for your account number, you should beware. Legitimate Credit Union staff would already have access to that information. It's important that the Credit Union has current information about how to reach you. If we detect potentially fraudulent use of your account, we will attempt to contact you immediately. If your address or phone number changes, please let us know.
7. **Pre-Approved Credit Solicitations**. If you would like to have your name taken off all pre-approved credit solicitations (not just Credit Union offers), you can write to the following credit reporting agencies. Please be sure to include your name, current address, Social Security number, home telephone number and date of birth.

**Experian
Consumer Opt-Out
P.O. Box 919
Allen, TX 75013**

**Equifax, Inc.
Options
P.O. Box 740123
Atlanta, GA 30374-0123**

**TransUnion
Name Removal Option
P.O. Box 505
Woodlyn, PA 19094**

**Innovis Consumer Assistance
P.O. Box 495
Pittsburgh, PA 15230-0495**

8. **Online Privacy Guidelines (Protecting Information Online)**. Whether you are a current member or just visiting us online, we safeguard the information you provide to us at www.ggtefcu.org. How we use and protect this information is described below:

- a. External Third Party Links.** Our website has a number of links to other third party sites. These links to external third parties are offered as a courtesy and a convenience to our members. Greenville Gas Turbine Employees Federal credit Union is **not responsible** for the privacy practices or the content of such websites.
- Third party merchants may collect personal information from you when you visit their sites. For example, they collect personal information from you when you provide billing information. They may also collect information from you if you send them an email. Some third party merchants may also send you a cookie to collect data on your Internet usage preferences. When you click on advertisements at third party sites, the advertising company may also send you a cookie. Greenville Gas Turbine Employees Federal Credit Union does NOT have access to this information, nor can we control how they use this information. **As a general precaution, you should always look for and review a site's Privacy Policy before giving out any personal information.**

If you have questions or concerns about the privacy policies and practices of these third parties, please review their websites and contact them directly. Greenville Gas Turbine Employees Federal Credit Union assumes no responsibility for the content, safety, security or privacy of any such site or any transactions you conduct through them. However, if you need any assistance in contacting these third parties, or if you have any concerns regarding unauthorized access to your accounts or Credit Union debit/ATM cards, please contact our office in person or call us at (864) 254-2883.

- b. Protecting Online Applications.** When you apply online for accounts or services, or enroll in our online banking services, you provide personal information that is necessary for us to process your application. To ensure that your application remains confidential, the information is sent to us in a "secured session". After you have submitted your application online, we recommend that you end your browser session before leaving your computer. We, along with outside companies with which we work, if applicable, may keep the information the application provided to us, along with information we collect from outside sources, so that we can offer you accounts and services related to your financial needs.
- c. Collection Information.** Our Internet financial services providers, , Database Management Services, Inc.®, HomeCU™, Jack Henry and Associates® and iPay Technologies, LLC™ (hereafter referred to collectively and individually as Service Provider), also collects and maintains certain information about our members simply to help us provide financial services to you online. They may also collect certain information for security and statistical purposes. The information collected may include:

- The Internet address (referral site) which brought you to our website.
- The date and time you access our site.
- The name and version of your web browser.
- Your Internet Protocol (IP) address.
- Content of cookies sent by Service Provider.
- The pages visited on our website.

The information collected on the pages you visit is used only for statistical purposes and is tied only to your IP address.

- d. Internet Protocol (IP) Addresses.** An IP address is a number that is automatically assigned to your computer whenever you are surfing the Web. Web servers – the computers that "serve up" Web pages – automatically identify your computer by its IP address.

The Service Provider does not link IP addresses to anything personally identifiable which means that a user's session will be logged, but the user remains anonymous to us and the Service Provider.

The Service Provider may use IP addresses to audit the use of our site. The Service provider can and will use IP addresses to identify a user when necessary for security purposes.

- e. **Visitors to Our Website.** Visitors to our website remain anonymous. We do not collect unique identifying information about you unless you voluntarily and knowingly provide us that information, and we do not send you a “cookie”.

The Service Provider does collect and disclose general information to us about your visit, such as when you accessed our site, which pages you accessed in our website, and what internet provider you used when you accessed our site.

You may elect to provide us with more specific information, such as when you give us feedback or send us an email. If you provide us this information, it is only used internally and in furtherance of the purpose for which it was intended.

We do not disclose or sell to any third party information that we collect or that is provided to us from visitors to our website. We do not send advertisements or email to someone who just visited our website.

- f. **Use of Cookies.** Internet Banking: When you log on to our Online Banking or Online Bill Payment Service, our Service Providers, Database Management Services, Inc.®, HomeCU™, Jack Henry and Associates® and/or iPay Technologies, LLC™, pass a cookie to your browser. The cookie only identifies your computer. Database Management Services, Inc.®, HomeCU™, Jack Henry and Associates® and/or iPay Technologies, LLC™ do not (and cannot) use cookies to collect or obtain new personal information about you.

This cookie allows , Database Management Services, Inc.®, HomeCU™, Jack Henry and Associates® and/or iPay Technologies, LLC to process multiple transactions during your session without requiring you to re-enter your Pass Code for each individual transaction.

The cookies for our Online Banking and Online Bill Pay simply provide another level of security for our Internet banking product.

The Database Management Services, Inc.®, HomeCU™, Jack Henry and Associates® and/or iPay Technologies, LLC banking products use encrypted cookies that do not pass to your hard drive. Instead, the cookie is stored in the memory of your browser, identifying your computer while you are logged on. Only Database Management Services, Inc.®, HomeCU™, Jack Henry and Associates® and/or iPay Technologies, LLC can read the information in these cookies. When you log off, close your browser, or turn off your computer and the cookie is destroyed. A new cookie is used for each session. That way, no one can use the prior cookie to access your account. For additional security, the cookie expires after ten (10) minutes of inactivity. It must then be renewed by re-entering your Pass Code.

- 9. **Protecting Children.** We do not knowingly solicit or collect data from children and we do not knowingly market to children online. We recognize that protecting children’s identities and online privacy is important and that responsibility rests with us and the parents.