



Privacy Policy

Last Revised: July, 2004

Privacy Policy Statement

Bank-Fund Staff Federal Credit Union (BFSFCU) recognizes its responsibility to protect the privacy of personal, nonpublic information our members provide regarding their financial transactions with us. BFSFCU will take all necessary steps to safeguard sensitive information that has been entrusted to us by our members.

The purpose of this policy is to set forth the guidelines under which such information may be shared with third parties. It is the intent of BFSFCU to abide by all applicable laws and regulations governing the privacy of member information.

Guidelines

(1) **COLLECTION OF INFORMATION:** In the course of delivering products and services, BFSFCU obtains member information, either directly from the member or from outside sources. This information is used to comply with federal and state laws and regulations, to provide effective member service and to inform members of products and services which may be of interest.

(2) **MAINTENANCE OF ACCURATE INFORMATION:** BFSFCU will exercise reasonable caution in the gathering and maintenance of information to ensure its accuracy. When inaccurate information is discovered, it will be corrected as promptly as possible.

(3) **DISCLOSING INFORMATION TO THIRD PARTIES:** BFSFCU will not sell member information to third parties. Information will only be shared with third parties under the following conditions:

- a. When disclosure is required to complete member-authorized transactions (such as check or credit card processing).
- b. To verify the existence or condition of member accounts to a third party (such as a credit bureau), as permitted by law.
- c. To comply with a court order or applicable laws or regulations.
- d. When authorized by written permission from the member.
- e. As part of a member service agreement with an approved service partner, provided the third party is contractually bound to perform services and to maintain the confidentiality of the information.

(4) **RESPONSIBILITY OF SERVICE PARTNERS:** BFSFCU will only approve service partners with established policies of privacy similar to those of BFSFCU. Each service partner will be required to sign an addendum to the service agreement describing the

privacy policies.

(5) PRIVACY OF ELECTRONIC TRANSACTIONS:

- a. Encryption. Electronic interfaces with members (such as Internet transactions) will be encrypted using Secure Socket Layer (SSL) 128-bit encryption.
- b. Account Access. Member account information and transactions will be protected by a password that must be used in conjunction with a username or account number. Members must apply for this capability and be registered with BFSFCU for authentication purposes.
- c. "Cookies". BFSFCU may use "cookies" as part of its web site interface. A "cookie" is a small file that is placed on the user's computer. We consider your privacy and the confidentiality of your business with us to be paramount in the trust you place in us. When we do collect information about you it is to facilitate our relationship. We use two methods for collecting and using information:

Through online forms on the web site(s) from data you provide when requesting products, services, or information from us. Some examples include loan applications, personal information updates, and Internet communications from you.

By using small client-side files that reside on your computer called cookies, of which we use two types:

1. Session cookies that expire at the end of your browsing session. For our purposes these are generally used by Online Banking to facilitate the internal processing of the transaction you conduct through the service.
2. Persistent cookies that expire at a date determined by us. These cookies are generally used to help us measure the effectiveness of our advertising campaigns and do not contain any personally identifiable or confidential information. They can also be used to help you personalize your experience on our web sites(s) should we choose to offer such a service.

Under no circumstances can a web site other than those from our domain read or interact with the cookies created by our domain and we do not share any data we may collect from cookie information that can be personally identifiable.

For more information about cookies and how they work visit:

<http://www.microsoft.com/info/cookies.htm>
<http://www.ufaq.org/navcom/lyncookie.html>

- d. Links. BFSFCU will frequently link to other sites as a convenience to our members. BFSFCU will seek to link with other sites that adhere to similar privacy

standards. However, BFSFCU is not responsible for the content of linked sites, or for their policies on the collection of member information.

(6) DISCLOSURE OF PRIVACY POLICY: BFSFCU will disclose its privacy policy as required by law. This will include a disclosure at the time a new member account is opened, a disclosure at least annually thereafter and such other disclosures as specifically required by law.

(7) TRAINING. Each employee, volunteer or other individual who has access to any information covered under this Policy shall be required to undergo training regarding this policy. Such training shall include, but not be limited to, coverage of all aspects of this Policy.