

FAMILIES FIRST FEDERAL CREDIT UNION
www.familiesfirstfcu.com

Privacy Policy

Families First Federal Credit Union is committed to providing members with financial products and services to meet their needs and to help them reach their financial goals. Protecting the privacy of their personal information and using it in a manner consistent with their expectations is also a high priority.

We may also disclose information for certain other specific purpose not described in this policy. These disclosures are permitted under the law and generality include information to process transactions on your behalf, such as check printing, information that is disclosed with your consent, or disclosures necessary to protect the security of our financial records.

Information That We Collect About Members

We collect the following information from the sources listed:

- Membership application form(s) and other forms we use to open your account membership share account.
- Application forms used to open other types of account at our credit union, such as share draft and Individual Retirement Accounts.
- Application forms used to obtain loans, credit cards, debit cards, or other services of our credit union
- Information created as a result of credit union membership. This includes account numbers. This also includes information about transactions that have occurred on these account or on credit cards or other loans with us.
- Credit reporting agencies
- Other sources to verify the information provided on application forms. This may be obtained from current or past employers, or from other institutions where financial transactions have been conducted.

Information About Members That We Disclose To Others

In order to provide members with financial products and services in a cost-efficient manner, Families First may disclose information about members to others. The following are sources of this information and examples of information content:

- Financial information supplied on application forms, such as income and assets.
- Other identifying information about members such as name, address, age telephone number, social security number, and employment history
- Other transaction information such as account balances, deposits, withdrawals, ATM activity, payment history, and credit card usage.
- Information from credit reports, such as credit history and other indications of creditworthiness.

As described below in "How We Protect Member Information", we have policies in place to protect confidentiality of information that is disclosed.

Parties to Whom We Disclose Information

We may disclose information about members to various outside parties. The following are types of businesses in which these parties are engaged, along with some examples of the businesses:

- Other providers of financial products and services, such as those that provide mortgage securities, credit card and insurance services
- Parties that collect information on loans, such as credit bureaus.

We may also disclose information to others that perform services for Families First Federal Credit Union. This is described below under "Discloser of Information to Parties That Provide Services to us."

Disclosure of Information about Former Members

It is generally unnecessary for us to disclose information about former members of Families First or others that have a relationship with us. However, to the extent we do disclose this information, we will adhere to the same policies described elsewhere in this policy.

Disclosure of Information to Parties the Provide Services to Us

We may disclose information to others to assist us in providing members with information about other products and services that may interest them. This may include information about such products and services that are offered through a joint agreement between us and other providers of financial services. The following are the sources of information about members that we disclose and the types of businesses that we provide with this information:

- Identifying information about members, such as name, address, and telephone number. This information is provided to firms that may contact you by mail or telephone to inform you about other financial products

and services that may be of interest to you. Under normal circumstances, Families First does not provide telephone numbers and our contracts stipulate that vendors will not contact members by telephone.

- Families First currently has joint marketing agreements with CUNA Mutual Insurance Company and with Loyal American Life Insurance company. Both are permitted to contact members by mail, but not by telephone. Both are also contractually responsible to refrain from selling or distributing information about our members to any source other than back to Families First FCU.
- Families First provides VISA credit cards and VISA debit cards via services agreements with League Services Credit Union, Equifax, and VISA International, all of whom are also contractually responsible to refrain from disseminating this information except as stipulated for necessary business purposes that comply with services requested by members.
- Families First provides information about creditworthiness, based solely upon our experience with borrowers, to other credit grantors. This is normally done through reporting automatically to various credit reporting agencies, by written request from mortgage credit grantors, and by requests from other lenders. This reporting is provided for contractually within our loan applications documents, signed by members who borrow.

Families First has policies in place to protect confidentiality of the information disclosed by us, as provided in the various contractual agreements referenced.

How Members May Opt out of Certain Disclosed of Information

Members may opt out of certain disclosure of information described in this notice. These opt out rights do not apply to information disclosed to parties that are affiliated with our credit union (such as VISA entities). These opt out rights also do not apply to disclosure of information for certain specific purposes such as:

- Information to process transactions on member behalf, such as check printing;
- Information that is disclosed with member consent;
- disclosure necessary to protect the security of our financial records; or
- Information as described above under Disclosure of Information to Parties That Provide Services to Us

Members may opt out of these disclosures at any time. Any member wishing to opt out must complete the appropriate form (see exhibit "A" attached) and deliver it to the credit union address indicated on the form.

Once we receive the written request, Families First has a reasonable amount of time to stop the disclosures. Members may always contact our office for assistance if they later wish to revoke any opt out election.

Information will be shared under Fair Credit Reporting Act. This act is under revision, and final language will be entered here after the new rules are adopted.

How We Protect Member Information

Only Families First employees or other authorized individuals will have access to information about members, and only to the extent that they have a need for the information. We prohibit our employees or other individuals from giving this information to anyone else in a manner that would violate the law or our privacy policy. We do not provide information about members to anyone else unless we first verify who they are and assure ourselves that they have the legal right to obtain this information. Families First employees are trained to ensure that your information is protected.

We also have in place safeguards to protect information against natural disasters, hazards, or threats. Concerning transactions that take place on the Internet: Families First does not presently have Internet transactions in place. When these become available, Families First will have additional security devices in place to ensure accuracy, integrity, and confidentiality of information.