

# **Privacy Policy**

Maven Federal Credit Union Privacy policy is to ensure the protection of members' privacy. The safekeeping of confidential information is of utmost concern to MFCU. It is MFCU's intent to comply with all applicable laws and regulations concerning the treatment of both member and non-member information, and educate our member as to their privacy rights under law. This policy outlines the purposes for which member information will be collected and released outside MFCU. The procedures in this policy implement the privacy practices disclosed in the Maven Federal Credit Union Notice and Privacy Disclosure Statement.

## **Information Collected**

MFCU will only collect information necessary to establish a relationship and provide products, services and opportunities to its members, non-member customers and consumers who come in contact with MFCU. Information on an individual member may be collected from a variety of sources, including the member's signature card, loan application, and credit bureaus. Furthermore, MFCU will take reasonable precautions to protect the accuracy and reliability of member information.

## **Information Shared with Affiliates & Third Parties**

MFCU will not sell non-public personal information on its members to any third party. MFCU may disclose non-public personal information about an individual member or members with member consent, in order to affect a transaction, to protect MFCU's interests, or for other purposes permitted by law; or to effect, administer or enforce a transaction. MFCU may also disclose information to companies that perform marketing services on its behalf or to other companies or financial institutions with which MFCU has joint marketing agreements.

#### **Third Party Privacy Standards**

Pursuant to Federal Law and Regulation, any information provided to a third party by MFCU, including non-public personal information about a consumer, is provided only to allow the third party to perform the services necessary under the contract, to process and/or service a transaction, or as required by federal/state law and/or regulation. Once this information is received by the third party from MFCU, whether it is directly or indirectly through an affiliate, the third party may not disclose it to any person that is not affiliated with either MFCU or the third party, unless the disclosure would be lawful if made directly by MFCU.

These third parties agree to restrict access to this information received from MFCU only to third party employees who need to know that information to provide products or services to MFCU, its members and consumers pursuant to this agreement. The third party also agrees to maintain physical, electronic and procedural safeguards that comply with the federal regulations or any other appropriate measures to guard non-public personal information to protect the confidentiality and security of this information shared by MFCU pursuant to the agreement. MFCU will accomplish this by making its Privacy Policy available to third parties



with which it must disclose information and require confidentiality and non-disclosure as a term of its relationship with all third parties and as part of all new contracts and contract renewals with joint marketing and service providers. MFCU will only continue to disclose non-public personal information to third parties who demonstrate a consistent commitment to the protection and confidentiality of member information, and who have adopted Privacy Policies comparable to those adopted by MFCU.

## Security & Confidentiality

MFCU will restrict access to personal and account information to those employees of MFCU, its affiliates and non-affiliated third parties who need to know that information to provide products, services or opportunities to its members and consumers. As part of MFCU's commitment to protect the confidentiality of member account information, MFCU will establish procedures for periodically training staff on the importance of member privacy and MFCU privacy policy. Staff will only be permitted to access member account information when necessary for business purposes. Finally, MFCU will establish appropriate security standards to protect against unauthorized access to non-public personal information.

### Availability of Policy

MFCU is proud of its commitment to member confidentiality, and will make this policy available to any consumer requesting it. MFCU will also post the policy on its website home page. A disclosure statement outlining this Privacy Policy and any revisions thereof are available to all member, non-member customers who established a relationship with MFCU and consumers who inquire about Maven Federal Credit Union services.