# **Privacy Policy**

The protection of our members' privacy and the safekeeping of confidential information are of utmost concern to Seaboard Federal Credit Union. Members rely on our commitment to protect confidential information relating to their accounts.

## **Accuracy of Information**

Seaboard FCU will take reasonable precautions to protect the accuracy and reliability of member information. However, individual members are responsible for updating their member record(s) from time to time in order to assure accuracy. Such changes might include a change of address, marital status, or other personal information. Seaboard FCU will respond to requests to update information on a member's account as quickly as possible.

#### **Internal Procedures**

As part of our commitment to protect the confidentiality of member account information, Seaboard FCU has established procedures for periodically training staff on the importance of member privacy, and the credit union's privacy policy. Staff members are required to sign a Confidentiality Agreement as a part of their orientation.

Staff may access member account information only when necessary for business reasons.

Seaboard FCU has also established appropriate security standards to protect against unauthorized access to member information.

#### When Information May be Shared

Seaboard FCU may share information with affiliates under joint marketing agreements to complete transactions desired by the member: check ordering, check processing, credit life and disability insurance, etc. We will not authorize these affiliates to charge a member's account for services rendered unless we receive the member's express written consent to do so.

Seaboard FCU strives to assure that all affiliates maintains privacy standards comparable to our own; therefore, before sharing any information with an affiliate, we will first obtain a written confidentiality statement from that affiliate.

The credit union may share information in other instances such as:

- (1) when necessary to complete a transaction as described above,
- (2) when a third party is verifying the existence or condition of your account in accordance with applicable law,
- (3) when such disclosure is in compliance with the law, government agencies or court orders,
- (4) when a member gives us written permission, or
- (5) to protect secured assets or the assets of the credit union.

#### **Non-Disclosure of Information**

Except in those circumstances described above, the credit does not share or disclose any non-public personal information to any non-affiliated third parties. Furthermore, the credit union will not sell or disclose, in part or in full, any member information to non-affiliated third parties, such as telemarketers.

Also, information obtained from outside sources (such as a credit bureau) will never be released by the credit union.

### **Availability of Policy**

Seaboard FCU is proud of its commitment to member confidentiality. We will make our policy available to any member or business affiliate requesting it.

# Complaints

Because of our high commitment to confidentiality of member information, complaints relating to this policy, or perceived non-compliance with this policy, should be forwarded directly to the President/CEO or to a member of our Supervisory Committee for prompt consideration.

Approved: January 28, 2002