

**MENOMINEE AREA CREDIT UNION
PRIVACY POLICY**

The directors, management and staff of Menominee Area Credit Union (MACU) are concerned about and respect the privacy of our members' personal financial information. We understand that our members furnish sensitive information to the credit union in the course of daily business, and MACU is committed to treating such information responsibly.

MACU will take all the necessary steps to safeguard sensitive information that has been entrusted to us by our members.

TYPES OF INFORMATION THE CREDIT UNION COLLECTS:

At MACU, we collect nonpublic information from many sources. Mainly, we collect such information directly from our members, co-borrowers, and on various applications and forms, for example, loan applications and membership applications. MACU also collects information as a result of transactions between the credit union and individuals, and as a result of providing our products and services. This includes transaction information from share drafts (checking acct), and electronic transfers.

TYPES OF INFORMATION THE CREDIT UNION DISCLOSES:

MACU may disclose the following types of information about current or former members to our affiliates:

- Identification information: name, address and telephone number
- Transactional information
- Deposits or loan account experience

Examples of the types of businesses we are affiliated with are:

- FiServ OnCu (our data processor)
- CenCorp (clearing for share drafts and EFT transactions)
- CUNA Mutual Insurance (several types of insurances)
- Liberty Mutual (auto insurance)

SAFEGUARDING MEMBER INFORMATION

At MACU we protect member privacy by ensuring that only employees who have a business reason for knowing information have access to it. The manager will be responsible for maintaining internal procedures to ensure that our members' information is protected. All employees have a copy of this policy and are trained annually regarding the importance of safeguarding member information. The manager will take disciplinary action against any employee who violates the credit union's privacy policy and procedures.

PRIVACY OF ELECTRONIC TRANSACTIONS

Encryption – Electronic interfaces with members (such as Internet transactions) will be encrypted using Secure Socket Layer (SSL) 128-bit encryption.

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 the Credit Union for authentication purposes.

“Cookies” – The Credit Union [may or may not] use “cookies” as part of its web site interface. A “cookie” is a small file that is placed on the user's computer. While it contains no member

information, it identifies the member's computer and allows the Credit Union to measure usage of the web site and customize the web site experience.

Links – The Credit Union will frequently link to other sites as a convenience to our members. The Credit Union will seek to link with other sites that adhere to similar privacy standards. However, the Credit Union is not responsible for the content of linked sites, or for their policies on the collection of member information.

MEMBERS RIGHT TO OPT OUT OF SHARING AGREEMENTS

If a member signs an opt-out notice at the time an account is opened or application processed, the credit union will honor the request immediately. However, members may opt out of the information sharing agreements at any time. If a member notifies the credit union in writing after an account is opened or application processed, MACU agrees to stop sharing the member's information immediately.

EXCEPTIONS TO A MEMBER'S OPT-OUT RIGHTS

By law, MACU may share personal information about members without allowing the opportunity to opt out in the following circumstances:

- With companies that perform transaction processing for the credit union
- For disclosures that are necessary to enforce the credit union legal or contractual rights or the rights of any person who is engaged in the financial transaction
- For disclosures required in the ordinary course of our business such as in the settlement of claims or benefits, the confirmation of information to a member or their agent, and the billing, processing or clearing of items in the normal course of business
- To provide information to our auditors
- To a consumer reporting agency under the Fair Credit Reporting Act
- To comply with federal, state or local laws, rules and other applicable legal requirements

Menominee Area Credit Union will not provide members' personal information to non-credit union companies for the purpose of their independent telemarketing or direct mail marketing of any non-financial products or services.

To “opt-out” of this policy, contact Menominee Area Credit Union at 906-863-6524.

**Menominee Area Credit Union
1011 23rd Avenue
Menominee, MI 49858**

I do not want my non-public personal information (other than as permitted by applicable law) to be provided to nonaffiliated third parties.

If you sign the opt-out notice, the credit union will honor your request immediately.

NAME _____
ADDRESS _____
CITY, STATE, ZIP _____
SIGNATURE _____ DATE _____

The Board of Directors approved and adopted this policy on October 14, 2008