



FIRSTLIGHT

FEDERAL CREDIT UNION

PRIVACY POLICY

Effective October 24, 2007
Last Revised May 2006

FirstLight Federal Credit Union (FLFCU) is committed to offering financial products and services that enable the organization's members to meet their financial needs and goals. Certain personal information is needed by the Credit Union to provide these products and services. It is the policy of FirstLight Federal Credit Union to protect the privacy of members' non-public personal information. This includes safeguarding from accidental or improper disclosure that personal information that has been gathered, used and stored for business purposes. Personal financial information, and any other non-public member information, will be held in the strictest confidence and used only for legitimate Credit Union purposes. This policy covers the capture, access, storage, and use of personal information regardless of the method of collection, filing or retrieval. This policy covers personal information kept in paper files as well as personal information kept on any form of electronic media.

FirstLight Federal Credit Union will adhere to the following privacy principles:

- The Credit Union will collect and store only that personal information that is needed to conduct business. The organization will limit the collection of personal information to that required for delivering those competitive financial products and services that any member may request or the Credit Union may offer.
- The Credit Union will maintain strong security controls to protect personal information in files and computer systems. The organization will safeguard the confidentiality of any non-public personal information that members share with the Credit Union. It is the goal of FLFCU to prevent the accidental or unauthorized disclosure of confidential and non-public personal information.
- The Credit Union will limit access to personal information to only those employees and employees of affiliated third parties who need access to that information in the conduct of business. FLFCU members will have access to their own personal information so that they have the opportunity to ensure that the organization's records are complete and accurate. The organization will strive to keep personal information complete, accurate and up to date.
- The Credit Union will only share personal information when necessary. FLFCU will only disclose personal information to a third party organization that is related to the Credit Union's business activities through a contractual business partnership. This type of arrangement allows members access to relevant business products and services that have been deemed beneficial by the Credit Union.
- The Credit Union will only partner with businesses that follow strict privacy policies. Whenever the Credit Union forms a partnership with another organization to provide specific products and services, FLFCU will require that the other organization conform to the Credit Union's privacy standards. FLFCU will only furnish the personal information that such other organization may need to provide their products and services to the Credit Union's members.

- The Credit Union will provide members the means to remove their names from any marketing lists that may be compiled by the Credit Union. FLFCU will inform members how to keep their personal information from being shared with the organization's business partners, and FLFCU will take all reasonable steps to make sure members' requests are followed. At least once each year, the Credit Union will remind all members that they may elect to keep their own personal information from being shared with FLFCU business partners.
- The Credit Union may be required to provide certain personal information to a governmental agency, such as a court of law. FLFCU will comply with the Right of Financial Privacy Act. The Credit Union will exchange personal information with reputable reference sources and credit bureaus for the purposes of credit reporting and credit analysis.
- The Credit Union will not authorize a third party to charge a member's account without his or her express consent, and will not sell personal information to telemarketing firms. The organization will not provide account numbers or personal access numbers to any nonaffiliated third party for marketing purposes.
- The Credit Union will enforce this policy. Employees who knowingly violate this privacy policy will be subject to disciplinary action.

GENERAL POLICY SECTION

Definition of Personal Information

Personal information is defined as non-public personally identifiable financial information provided by a member to the Credit Union, such as on a loan application, or resulting from any transaction between the member and the Credit Union. This definition of personal information excludes publicly available personal information, such as name and address, except when the Credit Union uses publicly available information that has been sorted by any form of non-public personal information, such as marketing lists that have been sorted by income.

Collection of Personal Information

When a member applies for a credit union account, loan, or other service, the Credit Union will collect certain personal information in order to process the application. The Credit Union will retain this information so that the organization can provide the products and services requested. Some non-public personal information may be furnished by or provided to a business partner, such as a credit bureau, if a member has applied for a loan.

When a member opens or uses an account or service at the Credit Union, FLFCU will retain personal information, including transactional data, for record keeping purposes and to furnish periodic account statements. The FLFCU computer system captures and stores

information to allow the organization to process and confirm transactions, including the transactions a member might conduct online through the organization's Internet remote banking systems. Where appropriate, FLFCU will use security-encoding techniques to protect against unauthorized access to personal records, ensure accuracy and integrity of communications and transactions, and protect member confidentiality.

Use of Personal Information

The Credit Union will use personal information in the normal course of business to provide business products and services. The organization will also use this information to provide positive identification when a member contacts the Credit Union.

FLFCU will not disclose to third parties information concerning members' accounts with the Credit Union, except: (a) when such disclosure is necessary to complete transactions; (b) to verify the existence and condition of an account for a third party (such as a credit bureau) as is permitted by law; (c) to comply with any court order or applicable laws or regulations; or (d) when a member gives the Credit Union written permission. An exception will be to furnish certain information to Credit Union affiliates and contractual business partners.

The Credit Union does not, and will not, sell or provide personal information to independent, non-affiliated third parties for their use.

COMPUTER AND INTERNET SECTION

Timeliness of Personal Information

All personal information and transactions recorded by the Credit Union during normal business hours are processed on FLFCU computers on a real time, online basis. During some periods outside of business hours some computerized transactions are handled on a stored and forward basis. In this instance, the transactions are posted to an account the next business day.

Protection of Personal Information

Each member has a responsibility to safeguard his or her own personal financial information. The Credit Union's Internet Remote Banking sessions are authenticated and encrypted. The authentication of a Remote Banking session is handled through a member's account number or Social Security number and PIN combination, which is required at login. The *encryption* is accomplished by establishing a Secure Socket Layer (SSL) connection between the browser and the Web server. A member can only access Remote Banking with an SSL compliant browser.

Protecting member privacy is an ongoing process. The Credit Union will continue to review the measures taken to safeguard members' personal information. These reviews will result in new measures to protect member records as the Credit Union makes

changes to its information security practices, and other internal control systems, to take advantage of new technology.

Response Program

The FirstLight Federal Credit Union will comply with Part 748 of the National Credit Union Administration Rules and Regulations. The Credit Union will have a response program in place to respond to any incidents of unauthorized access to or use of member information that could result in substantial harm or serious inconvenience to a member.

Use of Cookies

FirstLight Federal Credit Union uses cookies with its Remote Banking System as a means of maintaining the integrity of member sessions. Cookies are a requirement for Remote Banking to function properly. It is recommended that each member turn off any options warning him or her before accepting cookies. The cookies taken will not be sold, nor will any related information be shared with others outside the Credit Union, unless the organization is compelled to do so by law.

Use of Passwords and Personal Identification Numbers

While FirstLight Federal Credit Union takes great care to protect each member's personal information and keep it secure, each member is responsible for securing his or her Credit Union information on his or her personal computer. Members should choose a password that they can remember. Members should change their passwords regularly. Members should never tell anyone their password or PIN. Credit Union employees never need to know a member's password or PIN to provide assistance.

In addition, a Multifactor Authentication was added to online banking which is designed to provide layered security to Internet Banking. By answering a series of challenge questions, viewing an image and choosing to register your computer there is reassurance that our members will be in a secure place to conduct online banking.

External Links

The FirstLight Federal Credit Union website may contain links to other websites. The Credit Union is not responsible for the privacy practices or the content of other websites. In no event will the Credit Union be liable for problems arising from the use of the FLFCU website to link to other websites, including but not limited to computer viruses, loss of data, delay in operation or transmission or loss of privacy.