

Privacy Policy

EMT.CCO.003B

OWNER: EVP/Chief Operations and Digital Officer

Effective Date: October 20, 2022

POLICY STATEMENT

Allegacy Federal Credit Union (“Credit Union”) recognizes its responsibility to protect the privacy of member nonpublic personal information. This Policy aims to set forth the guidelines under which such information may be shared with third parties. It is the intent of the Credit Union and any of its affiliates to abide by all applicable laws and regulations governing the privacy of nonpublic personal information, including the Consumer Financial Protection Bureau (CFPB)’s Privacy of Consumer Financial Information rule (Regulation P), issued to implement the provisions of the Gramm-Leach-Bliley Act and the Right to Financial Privacy Act.

BACKGROUND

The Credit Union realizes that its members expect and deserve privacy and security for their personal and financial matters. The Credit Union understands the need to safeguard the sensitive information that our members have entrusted to it. Furthermore, there are numerous federal laws and regulations that govern how the Credit Union should address privacy. Therefore, standards and procedures will be designed to comply with applicable laws and protect against this information’s misuse.

1. SCOPE

1.1. This Policy shall apply to all Credit Union operations, member interactions, and data.

2. PURPOSE

2.1. To comply with federal and state law and to protect the privacy of the Credit Union’s members.

3. ROLES, RESPONSIBILITIES, AND DELEGATION OF AUTHORITY.

3.1. The Board appoints the EVP/Chief Operations and Digital Officer to implement and update this Policy and any Procedure promulgated thereunder as may be necessary or advisable.

4. PROTECTION AND SHARING OF PERSONAL INFORMATION

4.1. The attached “Exhibit A” sets forth the Credit Unions Privacy Policy, including, without limitation, the sharing, use, and protection of the Credit Union members’ personal information.

5. EXCEPTIONS

5.1. There may be no exceptions to this Policy.

This Policy shall be made available to the membership.

Effective Date: October 20, 2022

Replaces: April 15, 2021

6. REFERENCES

- 6.1. Gramm-Leach-Bliley Act
- 6.2. NCUA Letter 01-CU-02
- 6.3. 12 CFR 1016 (Regulation P)
- 6.4. Allegacy Federal Credit Union Bylaws

EXHIBIT A



FACTS	WHAT DOES ALLEGACY DO WITH YOUR PERSONAL INFORMATION?	
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.	
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ◦ Social Security number ◦ Account balances ◦ Transaction or loss history ◦ Credit scores ◦ Purchase history ◦ Credit card or other debt <p>When you are no longer a member, we continue to share your information as described in this notice.</p>	
How?	All financial companies need to share members' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their members' personal information; the reasons Allegacy chooses to share; and whether you can limit this sharing.	
	Reasons we can share your personal information	Does Allegacy share?
	For our everyday business purposes - such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes
	For our marketing purposes - to offer our products and services to you	Yes
	For joint marketing with other financial companies	Yes
	For our affiliates' everyday business purposes - information about your transactions and experiences	Yes
	For our affiliates' everyday business purposes - information about your creditworthiness	No
	For our affiliates to market to you	No
	For nonaffiliates to market to you	No
		Can you limit this sharing?
		No
		Yes
		Yes
		We don't share
		We don't share
		We don't share
To limit our sharing	<ul style="list-style-type: none"> ◦ Call 336-774-3400/800-782-4670 – our menu will prompt you through your choice(s) or ◦ Talk to your financial advisor or visit a financial center <p>Please note: If you are a new member, we can begin sharing your information thirty (30) days from the date we sent this notice. When you are no longer our member, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p>	
Questions?	Call 336-774-3400/800-782-4670 or go to www.allegacy.org	

Who We Are	
Who is providing this notice?	Allegacy means Allegacy Federal Credit Union (including Allegacy Investment Group (AIG)).
What We Do	
How does Allegacy protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. We also maintain other physical, electronic and procedural safeguards to protect this information and we limit access to information to those for whom access is appropriate.
How does Allegacy collect my personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> ◦ Open an account ◦ Apply for a loan ◦ Use your credit or debit card ◦ Seek advice about your investments ◦ Make deposits or withdrawals from your account We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.
Why can't I limit all sharing?	Federal law gives you the right to limit only <ul style="list-style-type: none"> ◦ sharing for affiliates' everyday business purposes - information about your creditworthiness ◦ affiliates from using your information to market to you ◦ sharing for nonaffiliates to market to you State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account unless you tell us otherwise.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and non-financial companies. <ul style="list-style-type: none"> ◦ Our affiliates include: <ul style="list-style-type: none"> ◦ Financial companies such as: Allegacy Services, LLC
Nonaffiliates	Companies not related by common ownership or control. They can be financial and non-financial companies. <ul style="list-style-type: none"> ◦ Allegacy does not share with nonaffiliates so they can market to you.
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> ◦ Our joint marketing partners include credit card companies and insurance companies

Other Important Information

You may have other privacy protections under some state laws. We will comply with applicable state laws as to information about you.

For Alaska, Illinois, Maryland and North Dakota Members. We will not share personal information with nonaffiliates either for them to market to you or for joint marketing - without your authorization.

For California Members. Accounts with California addresses will be treated as if you opted out of joint marketing agreements. Therefore, we will not share personal information with nonaffiliates either for them to market to you or for joint marketing - without your authorization. We will also limit our sharing of personal information about you with our affiliates to comply with all California privacy laws that apply to us.

For Massachusetts, Mississippi and New Jersey Members. We will not share personal information from deposit or share relationships with nonaffiliates either for them to market to you or for joint marketing - without your authorization.

For Vermont. We automatically treat members with a Vermont mailing address as having limited sharing with our affiliates.

Call Monitoring and Recording. If you communicate with us by telephone, we may record and retain the call.

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*Non-deposit investment products and services are offered through CUSO Financial Services, L.P. ("CFS"), a registered broker-dealer (Member FINRA/SIPC) and Registered Investment Advisor. Products offered through CFS: are not NCUA/NCUSIF or otherwise federally insured, are not guarantees or obligations of the credit union and may involve investment risk including possible loss of principal. Investment Representatives are registered through CFS. Allegacy Federal Credit Union has contracted with CFS to make non-deposit investment products and services available to credit union members.