

PRIVACY POLICY

Kelly Federal Credit Union

POLICY STATEMENT

Kelly Federal Credit Union will fully comply with the provisions of both the Gramm-Leach-Bliley Act and the NCUA Privacy Regulations. In doing so, Kelly Federal Credit Union has prepared a privacy policy, will provide privacy disclosures, and, where required, give members the opportunity to opt-out of certain disclosures.

INFORMATION COLLECTED AND HOW IT IS USED

1. Information collected

Kelly Federal Credit Union will collect information necessary to provide our members products and services or as required by law. Kelly Federal Credit Union collects information about members or their account(s) from the following sources:

- From member applications or other forms (examples: name, address, social security number, assets, income)
- Member transaction(s) with the credit union, our affiliates, or others (examples: account balance, payment history, parties to transactions and credit card usage)
- Information we receive from a consumer reporting agency (example: credit history)

2. Former member information

Kelly Federal Credit Union will not share information about members who have terminated their relationship with the Credit Union, unless permitted or required by law.

Annual privacy notices will no longer be sent to those who have terminated their relationship with Kelly Federal Credit Union.

3. Information disclosed to third parties

a) Member information is not shared with non-affiliated third parties (unless exceptions are made)

Kelly Federal Credit Union does not share member information with non-affiliated third parties unless authorized or permitted by law. If Kelly Federal Credit Union shares information in the future that requires an opt-out form to be sent to members, one will be provided.

Kelly Federal Credit Union reserves the right to share confidential member information with attorneys, accountants, auditors, consumer reporting agencies, and to the extent permitted by the law, to law enforcement agencies and other official bodies without triggering a right for members to receive an opt-out form.

b) Contracts with affiliates

Under the Gramm-Leach-Bliley Act and NCUA Privacy Regulations, Kelly Federal Credit Union may share member information with affiliates of the credit union. The term "affiliate" means "any company that controls, is controlled by, or is under common control with another company." However, Kelly Federal Credit Union has provided in its contracts with these affiliates that member information will be kept confidential.

SAFEGUARDING MEMBER INFORMATION

1. Credit Union Security

Kelly Federal Credit union will maintain security measures consistent with the requirements of federal and state regulations, including risk management systems designed to prevent unauthorized access, both internal and external, to member information.

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Kelly Federal Credit Union has procedures in place to protect member information systems in the event of a natural disaster, intentional destruction, or technical failure.

Kelly Federal Credit Union restricts access to areas that contain member information.

2. Credit Union Employees and Officials

Kelly Federal Credit Union employees with access to member information will receive a copy of Kelly Federal Credit Union's Privacy Policy, and will be notified of the importance of maintaining the confidentiality of member information.

Kelly Federal Credit Union has established procedures to eliminate internal and external unauthorized access to member information.

Kelly Federal Credit Union's employees will be informed of and will have access to information regarding the proper procedures for filing reports with the appropriate regulatory and law enforcement agencies. Kelly Federal Credit Union may conduct background checks on its employees to ensure compliance with our security program. Kelly Federal Credit Union thoroughly investigates any allegations of employee misconduct. Kelly Federal Credit Union limits access to sensitive information to ensure confidentiality of member information.

Individuals other than credit union employees, including board members and volunteers, may have limited access to member information. Kelly Federal Credit Union has established confidentiality controls in order to protect improper access to, and distribution of, member information.

3. Third party vendors

Kelly Federal Credit Union has contracted with a service provider to install and/or maintain our member information system. Kelly Federal Credit Union has exercised due diligence in selecting our service provider to ensure that proper security measures are in place to protect member information. Kelly Federal Credit Union may regularly monitor service providers to ensure that they continue to satisfy their obligations.

PROTECTION OF MEMBER ACCOUNT NUMBERS

Kelly Federal Credit Union will only share account numbers or access codes as authorized or required by law.

NONMEMBER CONSUMER INFORMATION

Kelly Federal Credit Union does not provide services to nonmembers.

JOINT MARKETING AGREEMENTS

Kelly Federal Credit Union may enter into joint marketing agreements to provide member information to nonaffiliated third parties to perform services for the credit union or functions on behalf of the credit union.

Kelly Federal Credit Union includes language in these joint marketing agreements prohibiting nonaffiliated third parties from using or disclosing member information for purposes other than in the ordinary course of business to carry out the purposes for which the information was provided.

JOINT ACCOUNT HOLDERS/CO-BORROWERS

Kelly Federal Credit Union will treat joint account holder and/or co-borrower information in the same manner it treats the member information.