

# Hudson River Community Credit Union (HRCCU) Privacy Policy

At HRCCU nothing is more important to us than our member's right to privacy and the confidentiality of their personal information. This is why HRCCU supports a law requiring all financial institutions to have a privacy policy in place regarding member information to explain how we collect, use and safeguard that personal financial information and notify members about our Privacy Policy. The credit union recognizes and accepts its responsibility to maintain all nonpublic information about members and their business affairs in strictest confidence.

Maintaining the security and confidentiality of member information is a top priority for the credit union. HRCCU has adopted the following privacy policy regarding the collection, use, retention, and security of member personal and financial information.

## Information Collected

The Credit Union may collect "nonpublic personal information" about members from the following sources:

- Information on applications or other loan and account forms;
- Information about transactions with the Credit Union or its affiliates; and
- Information from third parties such as credit bureaus.

## Information HRCCU Shares

HRCCU does not sell or share member nonpublic information to outside vendors for solicitation of another company's products or services. HRCCU does not sell member information to anyone. In certain circumstances the credit union may disclose nonpublic personal information to third parties to assist in servicing the member's loan or account with us, to governmental entities in response to subpoenas, and to credit bureaus. The credit union may share nonpublic information with service provider vendors to process transaction account activity and to render periodic statements of this activity. The credit union shares nonpublic information with vendors hired by or under contract to provide the tools necessary to facilitate banking, i.e., personal/business check printer vendors, and with service provider vendors for ATM/VISA Debit Card issuance or problem solving. The credit union also shares nonpublic member information with recognized legal entities when required by law and with collection companies hired to collect delinquent monies owed to the credit union. Unless notified in writing not to, the credit union will share member nonpublic information with nonaffiliated vendors hired to keep the credit union informed of new/different products or services the credit union is offering. HRCCU does not disclose any nonpublic personal information to anyone, except as permitted by law.

## Disclosure of Information About Former Members

If a member decides to close his/her account(s) or becomes an inactive member, HRCCU will continue to adhere to the privacy policies and practices described in this Policy.

## Non-Public Personal Information and Nonaffiliated Third Parties

HRCCU may disclose nonpublic personal information to non-affiliated third parties for the purpose of assisting in the credit union's offer of new/different products or services. The following is an example of the kind of nonpublic personal information that may be disclosed to nonaffiliated third parties:

- Nonpublic personal information received from you on a credit union application or other forms, such as name and address. The member may not opt out of the disclosure of the information listed above.

**Types of Nonaffiliated Third Parties** – HRCCU may disclose nonpublic personal information to the following types of nonaffiliated third parties:

- Financial service providers, such as data processor, personal/business check vendors.

## Reasons for Disclosing

- To provide members with information about additional HRCCU products and services.
- For daily processing of checks/deposits to member account(s), for statement processing, for issuance or problem solving with regard to ATM/Visa Debit Card.

## Limitations on Disclosure

- Only allow direct mail solicitations of HRCCU products, services and special events.
- Do not allow telephone solicitations from outside marketers.
- Require that nonaffiliated third party vendors adhere to HRCCU's privacy guidelines, i.e.: no information on any of the credit union's members may be shared with any outside company.

## Security Procedures

HRCCU also takes steps to safeguard member information. The credit union

restricts access to member's personal and account information to those employees who need to know that information to provide products or services. Employees who violate these standards will be subject to disciplinary measures. Physical, electronic, and procedural safeguards are maintained that comply with federal standards to guard member nonpublic personal information.

## INTERNET PRIVACY:

### Personal Information Collected

HRCCU's website does not collect personal identifying information about you except when specifically and knowingly provided by the member. Once personal identifying information has been provided, it will be used for the purpose as described at the point of data collection. All such information will then be subject to the provisions of HRCCU's Privacy Notice. Under no circumstances will HRCCU and/or their affiliates ever solicit member's personal or financial information via the Internet, website or e-mail. If you receive such a request, do not respond and let us know immediately.

### General Information Collected

For each visitor to HRCCU's web pages, the credit union's web server automatically recognizes a user's software information, such as domain name (i.e., aol.com, msn.com), browser and operating system without identifying the user. The credit union also aggregates information on these visits to its site to provide information such as: how many visitors the site had, what sites they came from, which of the credit union's web pages they visited, how long they stayed at each site, and the total time of their visits. The general information we collect is used to analyze and improve the content of the site. It is not shared with other organizations for commercial purposes. If a member sends an e-mail, their return address will be displayed in the header the credit union receives. This information is used to respond to inquiries and messages that will be kept as a record of the credit union's contacts. HRCCU will not share that information with outside companies or agencies unless it is necessary to do so in order to respond to the e-mail or carry out a request therein, or unless required by law or court order.

### Cookie Technology

Some areas of the credit union's website may use a "cookie" stored in the member's computer memory. HRCCU only uses cookies for a number of administrative purposes; for example, to store the member's preferences for certain kinds of information so that the member does not have to input it every time he visits the site. None will contain information that will enable anyone other than the credit union to contact the member via telephone, e-mail, or any other means. If a member receives an email from HRCCU as a result of visiting the credit union's website, they will have an opportunity within the email to opt out from receiving future email solicitations from the credit union.

### Children's Online Privacy

Because HRCCU has no way of distinguishing the age of individuals who access its website, the credit union collects the same general information collected from any website user as well as personally-identifiable information from individuals under the age of 14 if they provide it. If such information is received via e-mail, HRCCU will respond to the communication as warranted but only retain the information in accordance with the credit union's general information collection policy. If an individual under the age of 18 provides personally identifiable information through an internet account application, the application will be declined and all related information would only be maintained as required or allowed by law.

### Links to Website

HRCCU is not responsible for the content or the privacy policies of websites to which it may provide links.

### Access to Your Information

As a member of our credit union, you will always have the opportunity to review your information and make necessary changes to ensure that our records are complete and accurate.

Please direct questions regarding this Privacy Policy to anyone on the HRCCU staff or call 518-654-9028 or 1-800-824-0700.

Effective 8/28/2008