

# **1<sup>st</sup> Community Federal Credit Union**

## **Web Site Privacy Policy**

As of 6-9-11

1st Community Federal Credit Union puts its members first and takes pride in offering a variety of financial services. Protecting your privacy, along with your financial assets, is central to our mission.

Whether you are an existing member or are considering membership with us, we understand how important it is to you to know how we collect, retain and use information about you. We recognize that you have a right to expect your personal financial information to remain private and secure. We maintain established industry standards and technology to ensure that your information is private and secure at all times.

1st Community Federal Credit Union's Web Site Privacy Policy appears below. It is our commitment to protect your personal information in accordance with this Policy.

### **Use, Collection and Retention of Member Information**

1st Community Federal Credit Union collects, retains and uses information about members only where reasonably necessary--and allowed by law--to administer our business and provide products, services, and other opportunities that we believe will benefit our members.

When you visit our Web site, we may collect and retain the following information about you: (1) the domain name from which you access the Internet (e.g., aol.com, att.net), (2) the date and time you access our site, and (3) the Internet address of the Web site from which you directly linked to our site, if applicable. We may use this information to measure the number of visitors to our site, and to help us make our site more useful to you.

If you identify yourself by inputting personal information at our Web site, we will use that information only to respond to your inquiry or request. We will not forward any such information to any third party unless required to complete your request or if required by law. We will never sell your information to anyone.

### **Maintenance of Accurate Information**

1st Community Federal Credit Union has established procedures to ensure that your personal information is accurate, current and complete in accordance with reasonable commercial standards. If you find that your account information is incorrect, call or write to us at the telephone number and address listed below. We will correct any erroneous information as quickly as possible.

### **Limiting Employee Access to Information**

1st Community Federal Credit Union limits employee access to personally identifiable member information to those employees with a valid business reason for knowing such information. We train our employees on the importance of member confidentiality and privacy, and require each of our employees to comply with this Policy and our standards of conduct and procedures.

### **Protection of Information by way of Established Security Procedures**

All of 1st Community Federal Credit Union's operational and data processing systems are in a secure environment that protects your account information from being accessed by third parties. In addition, we maintain established industry security standards and procedures to prevent unauthorized access to member information. Our home banking system uses a cryptographic (digital certificate) key to secure account information sent between our server and your browser. This communication key allows us to encrypt data sent through the Internet. Your browser must support 128-bit SSL encryption to use our website and online banking services. Our server also

employs sophisticated firewalls to prevent unauthorized access to credit union and member information.

### **Restrictions on Disclosure of Account Information**

1st Community Federal Credit Union does not share member information with unaffiliated third parties for their independent use, except for the exchange of information with reputable information reporting agencies in order to maximize the accuracy and security of such information and in connection with providing certain products or services that we believe may benefit our members.

We place strict limits on companies to whom we provide personally identifiable data for marketing purposes. Whenever we provide information for this purpose, we carefully review the company and the product or service to ensure that it provides value to our members. In addition, we share only the minimum amount of information necessary for that company to offer its product or service to you.

In addition to the foregoing, 1st Community Federal Credit Union must also provide member information in the following circumstances: (1) In order to complete a transaction initiated by one of our members, (2) if a member requests the disclosure, and (3) if the information disclosure is required by law.

### **Collection of Information from Children**

Protecting children's privacy is very important to 1<sup>st</sup> Community Credit Union. To the extent children use our website, the assistance of a parent or guardian is strongly recommended. We do not permit children under the age of 13 to submit personal information to us online, and we do not knowingly collect personal information online from children under 13.

### **Third Party Links**

We may offer third-party links on our website. These links are for your convenience and will connect you with providers of products and services that we believe may be of value to you. While we carefully screen the third parties we do business with, we do not administer any third-party websites we provide links to, and we are not responsible for the content on those sites. You should always review a third-party website provider's privacy policy before submitting any personal information or taking other action.

### **Maintaining Member Privacy in Business Relationships with Third Parties**

When 1st Community Federal Credit Union provides member information to a third party, we require--through a written agreement--that the third party adhere to privacy principles and standards of conduct similar to those to which 1st Community Federal Credit Union adheres for keeping member information confidential.

### **Internet Cookies**

To provide better service and a more effective Web site, we may use "cookies" as part of our interaction with your Internet browser. A "cookie" is a small text file placed on your hard drive by our Web page server. A cookie cannot retrieve any other data from your hard drive, pass on computer viruses, nor capture your e-mail address. Cookies are commonly used on Web sites and do not harm your system. We may use cookies in places where you may need to register, such as home banking, or where you are able to customize the information you see. Recording a cookie at such points makes your online experience easier and more personalized. We may also use cookies to identify what sections of our site our members visit most so we can continue to provide information on the products and services in which our members have demonstrated an interest. These cookies do not collect personally identifiable information and we do not combine information collected through cookies with other personal information to determine who you are or your e-mail address. By configuring your preferences or options in your Internet browser, you can control if and how a cookie will be accepted.

### **How to Protect Yourself on the Internet**

To keep your personal information and accounts secure when you go online, make sure to use personal firewalls and latest security software packages. You should also keep your computer's operating system and software up to date with the latest security patches. Also make sure you are using secure website connections on sites where personal or sensitive information may be involved. Your web browser Help section has more information about how to ensure secure website connections. Be aware that website downloads may contain malicious software and exercise caution. Avoid using public computers when providing or accessing your personal information online. Do not respond to anyone who asks you to provide your sensitive information through non-secure means such as standard email. If you believe that 1<sup>st</sup> Community Federal Credit Union needs information from you, call us on the number listed on your statement, not the number provided in a suspicious email or website. Contact us immediately if you suspect any fraudulent activity concerning your accounts or the credit union. Use passwords that are difficult to guess, such as those that consist of a combination of letters and numbers or other symbols, and change your password regularly. Do not store your password on your computer or give it to anyone else. If you need to write down your password, store it in a secure place. Be aware that using wireless connections can present security risks, especially wireless connections in public places. Always logout of online banking sessions instead of just closing your browser. Never permit web browsers to "remember" your user name for websites involving your personal information because then others having access to your computer may be able to access your information and accounts.

### **Policy Updates**

1<sup>st</sup> Community Federal Credit Union may, at any time and without notice, update this policy by posting the updated policy on our website. Any updated policy will be effective immediately upon posting on our website.

### **More Information**

1st Community Federal Credit Union values its members and their privacy. We want you to understand how we use the information you provide and our commitment to ensuring your personal privacy. If you have any questions about how 1st Community Federal Credit Union protects or uses your confidential information, please contact us at:

**(325) 653-1465**  
**1st Community Federal Credit Union**  
**3505 Wildewood Drive**  
**San Angelo, TX 76904-6433**

All deposits are insured to at least \$250,000 by the National Credit Union Administration (NCUA), a U.S. Government Agency.

f:\fcadmin\website\new site\policies\website privacy policy as of 6-9-11.doc