



PRIVACY POLICY

Board Approval Date: 2/16/2021

Written/Revised Date: 1/12/2021

POLICY STATEMENT

Blackhawk Community Credit Union (BHCCU) is committed to providing financial products and services that enable its members to meet their financial needs and goals while at the same time protecting the members' nonpublic personal information. Blackhawk Community Credit Union shall protect the confidentiality of its members' nonpublic information consistent with state and federal laws. BHCCU will not collect or maintain information that is not essential for prudent business reasons.

INTRODUCTION

The Consumer Financial Protection Bureau (CFPB) privacy rule applies to all federally-insured credit unions, as required by the Gramm-Leach-Bliley Act. It requires BHCCU to provide notices to its members about its privacy policies and practices, describe the conditions under which BHCCU may disclose nonpublic personal information about consumers to nonaffiliated third parties, and provide a method for consumers to prevent BHCCU from disclosing their nonpublic personal information (subject to the exceptions).

PURPOSE

Laws governing the treatment of consumer's nonpublic personal information serve to protect consumers from unlimited disclosure of personal financial information. Financial institutions may disclose, under certain conditions, nonpublic personal information about consumer members to affiliates and nonaffiliated third parties, provided appropriate notice has been provided to each member who obtains a BHCCU product or service, and the member has not opted out of such disclosure.

AUTHORITY & RESPONSIBILITY

BHCCU officers, directors, committee members, and employees are informed of their responsibility to hold in confidence all information with regards to its members' accounts and are bound by this Privacy Policy.

To protect against unauthorized access to member information, it is the responsibility of all BHCCU officers, Directors, committee members, and employees to identify any potential area of exposure and to report any such condition.

BHCCU will permit only authorized employees, who are trained in the proper handling of member information, to have access to member information. BHCCU will restrict access to members' nonpublic personal information to appropriate individuals who have a specific business purpose to utilize the data.

BHCCU will maintain strong security controls to ensure that member information in its files and computers is protected. Additionally, BHCCU maintains physical, electronic, and procedural safeguards that comply with federal regulations.

BHCCU will take reasonable measures to protect the accuracy and reliability of all member information that it uses in conducting business. Members are responsible for updating their member information periodically to ensure its accuracy. BHCCU will process all updated information requests promptly.

Individuals who violate this Privacy Policy will be subject to BHCCU's disciplinary process, which includes warnings, suspensions, discharge, and/or removal from position.

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DEFINITIONS

Nonpublic personal information: Nonpublic personal information is “personally identifiable financial information” that a consumer provides to BHCCU; the results of a transaction between the consumer and BHCCU; or information that BHCCU otherwise obtains about a consumer in connection with providing a financial product or service.

Consumer: A consumer is an individual (may be a member) who obtains or has obtained a financial product or service from BHCCU that is primarily used for personal, family, or household purposes. A consumer includes an individual’s legal representative.

Authorized Employee: An employee of BHCCU who has access to members’ nonpublic information strictly for business purposes as part of his/her job duties or who is acting at the direction of management.

Member: A member is a consumer who has an on-going member relationship with BHCCU.

Affiliate: An affiliate of a federally-insured, state-chartered credit union is a company that is controlled by BHCCU. (i.e. – a Credit Union Service Organization (CUSO)).

Nonaffiliated third party: means any person or company except:

- BHCCU’s affiliate; or
- A person employed jointly by BHCCU and any company that is not the BHCCU’s affiliate.

Safe Harbor: A legal provision to reduce or eliminate liability, as long as good faith is demonstrated, is a guarantee of compliance with the CFPB’s privacy notice requirements.

NOTICES

To ensure that BHCCU has a “safe harbor” regarding compliance with the CFPB’s privacy notice requirements, BHCCU will disclose its privacy practices as required by law, using the model forms provided by the CFPB.

BHCCU will provide an initial privacy disclosure notice to all individuals, who receive services from BHCCU for personal or household use, at the time a member relationship is established. If there is a change in the model privacy form or BHCCU changes its privacy practices, a revised privacy disclosure notice will be provided to members. The written notice will be provided in such a way that receipt can reasonably be expected and in a form that can be retained. The notice will contain BHCCU’s privacy policies and practices, conditions under which it may disclose nonpublic personal information to nonaffiliated third parties, and if necessary, the procedure for the person to opt out of information sharing in certain circumstances.

AMENDMENTS TO PRIVACY POLICY

Protecting its members’ privacy is an ongoing process and BHCCU will continue to review the measures it uses to safeguard member information. BHCCU reserves the right to amend this policy.

A privacy notice will be provided to all members, annually, if opt-out rights are triggered by BHCCU’s information sharing practices. A revised Privacy Statement will be immediately posted to BHCCU’s

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website, notices will be amended, and staff will be updated. The revised notice will be provided to the member with reasonable opportunity to “opt out”, if necessary. BHCCU will not disclose any information unless it has provided these notices and the consumer has not “opted out”.

SHARING INFORMATION

BHCCU may share information for legitimate business reasons or to offer members more choices and provide members greater convenience.

BHCCU will not disclose information concerning members’ accounts to third parties (excluding BHCCU affiliates) except:

1. When such information is necessary to complete the transaction(s);
2. To verify the existence and condition of members’ accounts for a third party (such as a credit bureau), as is permitted by law;
3. To comply with any court order, law enforcement agencies, or applicable laws or regulations; or
4. When members give BHCCU their written permission.

BHCCU has strict compliance guidelines and will only partner with businesses that follow strict confidentiality requirements. The partners that BHCCU selects are necessary to the financial stability of BHCCU, and also enhance the products and services for its members. BHCCU does not sell or provide personal, non-public information to third parties for independent use.

WEBSITE PRIVACY

Visitors to BHCCU’s website shall remain anonymous. BHCCU does not collect identifying information about visitors to its site. BHCCU does use standard web site software to collect non-identifying information about its visitors, such as: Date and Time, IP Address, or the type of browser used.

Any information that is sent to BHCCU, via e-mail or through the website, is used internally and is not sold to outside organizations.

The website contains links to other websites. BHCCU cannot be responsible for the privacy practices or the content of the linked websites, and BHCCU encourages its members to read the privacy statement of all linked websites to become acquainted with their specific privacy practices.

TRAINING

The employees and Board of Directors of BHCCU will receive annual training stressing the importance of this privacy policy and safeguarding members’ information.

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