#### Notice and Disclosure

Cooperative Choice Network Credit Union (known as "Credit Union") is committed to protecting the privacy of our members' financial records consistent with federal and state laws. In the course of providing our services, we collect information about the members, some of which is nonpublic personal information. We do not sell nonpublic personal information, but we do share such information with our service providers and others to better serve our members. We share nonpublic personal information only with contractual safeguards to protect the confidentiality of information. We maintain strong security controls to safeguard the privacy and accuracy of communications and transactions to protect our members' confidentiality.

## Information We Collect

We collect and retain information about members from the following sources: information we receive on applications; other forms (e.g., name, address, social security number, assets, and income); information received while verifying data provided on applications; information about transactions with us, our affiliates or others including those companies that work closely with us to provide financial products and services (e.g., account balance, payment history, parties to transactions and credit card usage); information we receive from a credit reporting agency or check verification agency; information contained in emails.

The Controls & Alerts App (CCNCU CardNav) periodically collects, transmits, and uses geolocation information to enable features that prevent fraudulent card use and send alerts, but only if the End User expressly authorizes collection of such information. Geolocation information can be monitored on a continuous basis in the background only while the Solution is being used or not at all, depending on the End User's selection. End Users can change their location permissions at any time in their device settings.

# Information We Disclose

We may disclose all the information we collect, as described above, as permitted by law and in accordance with the credit union's privacy policy.

### Disclosure of Information to Parties that Provide Services to Us

In order to provide members competitive products and services, we may disclose all of the information we collect, as described above, to companies that perform marketing or other services on our behalf and to other financial service providers with whom we have joint marketing agreements. We may also disclose nonpublic personal information to nonaffiliated third parties as permitted or required by law. These disclosures typically include information to process transactions on the member's behalf, conduct our operations, follow members' instructions as authorized, or protect the security of our financial records.

Fair Credit Reporting Act Disclosures

We are permitted by law to share any information about transactions or experiences with members. However, information taken from credit reports will not be exchanged or shared with anyone. We may report information to credit bureaus, such as late payments, missed payments, or other defaults on accounts which may be reflected on a credit report.

### **COPPA**

The Children's Online Privacy Protection Act (COPPA) restricts the collection, use, or disclosure of Personal Information from and about children under the age of 13 on the internet. In compliance with COPPA, the Credit Union is committed to protecting the online privacy of the children who visit our website. The Credit Union's website and online services are not directed to children under the age of 13, nor is information knowingly collected from children under the age of 13. Should the Credit Union receive information (name, address, email, account number, telephone, social security number) from a child known to be under 13, the information will only be used to respond directly to the child, seek parental consent, or provide parental notice. The Credit Union is not responsible for the data collection and use practices of non-affiliated third parties. For more information about the Children's Online Privacy Protection Act (COPPA), please visit the Federal Trade Commission's website.

## How We Protect Information

We restrict access to nonpublic personal information to those credit union employees who need to know that information to provide products or services. All our employees receive training regarding confidentiality and security of member information. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.

## Members Responsibility to Protect Information

The credit union is committed to protecting the privacy of its members. There are certain things that a member should also do to protect their privacy. For instance, in order to protect the transmission of information sent electronically to the credit union, these messages should be sent through the online banking system that has a secure server or through CCNCU Secure Mail. In connection with any passwords or PIN information, members should keep that information confidential and in a location separate from account numbers (e.g., member number, card numbers) and protected in a way that a third party would be unable to easily identify the member or their information. Our staff will already have access to member information (except PINs which members should not disclose even to credit union staff) when they contact members—they will not have to ask a member for it. If a member has any questions regarding the credit union's privacy policies or other information, please contact the Credit Union at: Cooperative Choice Network Credit Union, 3919 N. University St. Peoria, IL 61614, email info@ccncu.com or call 309-621-7930.

## Required Disclosure

CCNCU will provide the required Privacy Notice when a new membership is open, annually, upon request from a member, and on the website as appropriate.