



Enfield Community Federal Credit Union Privacy Policy

The Enfield Community Federal Credit Union (Credit Union) recognizes its responsibility to protect the privacy of member nonpublic personal information. The purpose of this policy is to set forth the guidelines under which such information may be shared with third parties. It is the intent of the Credit Union and any of its affiliates to abide by all applicable laws and regulations governing the privacy of nonpublic personal information including the Consumer Financial Protection Bureau (CFPB)'s Privacy of Consumer Financial Information rule (Regulation P), issued to implement the provisions of the Gramm-Leach-Bliley Act and the Right to Financial Privacy Act.

A. Information We Collect About Members

The Credit Union collects non-public personal information about members from the following sources:

1. Information we receive from members on applications and other forms,
2. Information about member transactions with the Credit Union, and
3. Information we receive from a consumer reporting agency

We may disclose all of the information we collect, as described above, as permitted by law.

B. Parties Who Receive Information From Us

The Credit Union may disclose non-public personal information about members to the following types of third parties:

1. **Financial service providers** such as insurance companies, mortgage service companies, and securities broker-dealers
2. **Non-financial companies**, such as consumer reporting agencies, data processors, check/share draft printers, financial statement publishers, plastic card processors, and government agencies

C. Disclosure of Information to Parties That Provide Services to Us

In order for the Credit Union to conduct the business, disclosure of all information we collect may be provided to companies that perform marketing or other services on our behalf. This may support providing members' competitive products and services and other related benefits. We may also disclose non-public personal information about members under circumstances as permitted or required by law. These disclosures typically include information to process transactions on their behalf, conduct the operations of our credit union, follow instructions per member's authorization, or protect the security of our financial records.



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To protect the privacy of our members', we only work and establish agreements with companies that consent to maintain strong confidentiality protections and limit the use of information we provide. We do not permit these companies to sell the information we provide to other third parties.

D. Disclosure of Information About Former Members

Upon termination of membership, the Credit Union will not share information about members, except as may be permitted or required by law.

E. Protection of Member Information

The Credit Union restricts access to non-public personal information about members to those employees who need to know that information to provide products or services to the membership. We maintain physical, electronic, or procedural safeguards that comply with federal regulations to guard member nonpublic personal information.

F. Disclosure Of Privacy Policy

The Credit Union will disclose its privacy policy as required by law, in a form that the members can keep. This disclosure will be in the form of an initial disclosure and will also be provided to members annually.

1. **Initial Privacy Notice.** The Credit Union will deliver a notice describing the Credit Union's privacy policy to each new member who establishes a relationship with the Credit Union. This initial privacy notice will be provided at or before an establishment of a member relationship. A new privacy notice need not be given for each subsequent account opening, if the privacy notice has not changed from the previously provided privacy notice.
2. **Annual Notice.** The Credit Union will provide a notice of this Privacy Policy to all members at least annually (once during any 12 consecutive months). The Credit Union need not provide an annual notice to members or consumers who no longer have a relationship with the Credit Union.
3. **Privacy Notice May Be Combined With or In Other Documents.** The Credit Union's privacy notice may be combined with other information, so long as it is presented in a way that is "clear and conspicuous"; and so that each member can retain its content.