

DETOUR DRUMMOND COMMUNITY CU

34857 S TOWNLINE ROAD
DRUMMOND ISLAND, MI 49726
906-493-5263

PRIVACY POLICY

Opening Statement

DeTour Drummond Community Credit Union will fully comply with the provisions of both the Gramm-Leach-Bliley Act and the NCUA Privacy Regulations. In doing so, DeTour Drummond Community Credit Union has prepared a privacy policy, will provide privacy disclosures, and where required, give members the opportunity to opt-out of certain disclosures.

Information Collected and How it is Used

1. Information Collected

DeTour Drummond Community Credit Union will collect information necessary to provide our members products and services, or as required by law. DeTour Drummond Community Credit Union collects information about members and their account(s) from the following sources:

- a. Member applications or other forms (examples: name, address, social security number, assets, and income)
- b. Member transactions with the credit union, our affiliates, or other (examples: account balance, payment history, parties to transactions, and credit card usage)
- c. Information we receive from a consumer reporting agency (example: credit history)

2. Former Member Information

- a. DeTour Drummond Community Credit Union will not share information about members who have terminated their relationship with the credit union, unless permitted or required by law to do so.
- b. Annual privacy notices will no longer be sent to those who have terminated their relationship with DeTour Drummond Community Credit Union.

3. Information Disclosed to Third Parties

- a. Member information is not shared with non-affiliated third parties (unless expected):

DeTour Drummond Community Credit Union does not share member information with non-affiliated third parties unless authorized or permitted by law. If DeTour Drummond Community Credit Union shares the information in the future that does not currently require an opt-out form to be sent to members, the opt-out form will be provided when it becomes a requirement. DeTour Drummond Community Credit Union reserves the right to share confidential member information with attorneys, accountants, auditors, consumer reporting agencies and other official bodies without triggering a right for members to receive an opt-out form.

- b. Contracts with affiliates under both the Gramm-Leach-Bliley Act and NCUA Privacy Regulations, DeTour Drummond Community Credit Union may share member information with affiliates of DeTour Drummond Community Credit Union. The term "affiliate" means: any company that controls, is controlled by, or is under common control with another company. However, DeTour Drummond Community Credit Union has provided in its contracts with these affiliates that member information will be kept confidential.

Safeguarding Member Information

1. Credit Union Security

DeTour Drummond Community Credit Union will maintain security measures consistent with the requirements of federal and state regulations, including risk management systems designed to prevent unauthorized access, both internal and external, to member information.

DeTour Drummond Community Credit Union has procedures in place to protect member information systems in the event of a natural disaster, intentional destruction, or technical failure.

DeTour Drummond Community Credit Union regularly tests the efficacy of its member information systems to ensure proper working order.

Independent third parties or staff members independent of those who have developed or maintained our security programs may conduct these tests. DeTour Drummond Community Credit Union restricts access to areas that contain member information.

2. Credit Union Employees and Officials

DeTour Drummond Community Credit Union employees with access to member information will receive a copy of the DeTour Drummond Community Credit Union Privacy Policy, and will be notified of the importance of maintaining the confidentiality of member information. Employees will be required to sign a confidentiality agreement upon employment.

DeTour Drummond Community Credit Union has established procedures to eliminate internal and external unauthorized access to member information.

DeTour Drummond Community Credit Union's employees will be informed of and will have access to the information regarding the proper procedures for filing reports to the appropriate regulatory and law enforcement agencies. DeTour Drummond Community Credit Union may conduct background checks on its employees to ensure compliance with our security program. DeTour Drummond Community Credit Union thoroughly investigates any allegations of employee misconduct. DeTour Drummond Community Credit Union limits access to sensitive information to specific employees to ensure confidentiality of members' information. Individuals other than credit union employees, including board members and volunteers, may have limited access to member information. DeTour Drummond Community Credit Union has established confidentiality controls in order to prevent improper access to, and distribution of, member information.

3. Third Party Vendors

DeTour Drummond Community Credit Union has contracted with a service provider to install and/or maintain our member information system.

DeTour Drummond Community Credit Union has exercised due diligence in selecting our service provider to ensure that proper security measures are in place to protect member information. DeTour Drummond Community Credit Union may regularly monitor service providers to ensure that they continue to satisfy their obligations.

Protection of Member Account Numbers

DeTour Drummond Community Credit Union will only share account number or access codes as authorized or required by law.

Breach of Confidential Information

In the event that there is an accidental and unintentional breach of our privacy policy, the credit union will take the following actions:

- The credit union will notify you of the breach as soon as possible via phone or written letter.
- The credit union will make available to you the option for us to monitor your credit report for a period of up to one year following the breach.

Nonmember Consumer Information

DeTour Drummond Community Credit Union regularly provides services to nonmembers such as ATM access, and cash advances on credit cards.

DeTour Drummond Community Credit Union does not share information about nonmembers unless permitted or required by law.

DeTour Drummond Community Credit Union retains information about nonmember consumers in a manner consistent with the credit union's Record Retention Policy.

Joint Marketing Agreements

DeTour Drummond Community Credit Union may enter into joint marketing agreements to provide member information to non-affiliated third parties to perform services for the credit union or functions on behalf of the credit union.

DeTour Drummond Community Credit Union includes language in these joint marketing agreements prohibiting non-affiliating third parties from using or disclosing member information for purposes other than ordinary course of business to carry out the purposes for which the information was provided.