

PRIVACY POLICY OF WAYNE COUNTY COMMUNITY FEDERAL CREDIT UNION

FACTS:

WHAT DOES WAYNE COUNTY COMMUNITY FEDERAL CREDIT UNION DO WITH YOUR PERSONAL INFORMATION?

WHY?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

WHAT?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Name and address, Social Security numbers, account number(s) and transactions, advances and account history.
- Information to process transactions on your behalf, conduct the operations of the credit union, and to provide you with certain financial services and opportunities.

HOW?

All financial companies need to share certain personal information to run their everyday business. In the section below, we list the reasons financial companies (including Wayne County Community Federal Credit Union) can share their members' personal information; the reasons Wayne County Community Federal Credit Union (WCCFCU) chooses to share; and whether you can limit this sharing.

WHO WE ARE:

Who is providing this notice?

Wayne County Community Federal Credit Union, serving all who live, work, worship or attend school in Wayne County, Ohio with offices located at 311 Kaufman Drive, PO Box 214, Smithville, OH 44677 and at 100 West Market St., Orrville, OH 44667. Our website is www.wccfcu.com.

WHAT WE DO:

How does WCCFCU protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. This credit union will only share information with affiliates that have been approved by the Board of Directors of Wayne County Community Federal Credit Union.

Reasons we can share your personal information	Does WCCFCU share?	Can you limit this sharing?
For our everyday purposes—such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes—to offer products and services to you	Yes	No
For joint marketing with other financial companies	Yes	Yes
For our affiliates' everyday business purposes—information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes—information about your creditworthiness	Yes	Yes (in most cases)
For our affiliates to market to you	Yes	Yes (in most cases)
For non-affiliates to market to you	Yes (in a few cases)	Yes (in most cases)

How does WCCFCU collect my personal information?

We collect your personal information, for example, when you:

- apply for membership or provide information on applications and other forms
- conduct transactions with us or others
- have information we may obtain from a consumer reporting agency, or from consumer purchasing and census data.

Why can't I limit all sharing?

WCCFCU does not sell member information. In accordance with Federal law, WCCFCU does share information for affiliates' everyday business purposes including some information about your creditworthiness. You may limit affiliates from using your information to market to you, and sharing your information to non-affiliates to market to you. State laws and individual companies may give you additional rights to limit sharing.

What happens when I limit sharing for an account I hold jointly with someone else?

All of the account information is limited, including the joint account holder's information.

DEFINITIONS

Affiliates:

Companies related by common ownership or control. They can be financial and nonfinancial companies.

Non-affiliates:

Companies not related by common ownership or control. They can be financial and nonfinancial companies. This may include (but is not limited to) data processors, statement processors and printers, and other processors providing services such as shared branching, ATM, Debit Card and services.

Joint marketing:

A formal agreement between non-affiliated financial companies that together market financial products or services to you. Wayne County Community Federal Credit Union offers competitive products and services which may require sharing information to complete your transactions.

EMPLOYEES AND CONFIDENTIALITY

WCCFCU restricts access to nonpublic personal information about you to only those employees who have a specific business purpose for using it. Our employees are trained on the importance of maintaining confidentiality and member privacy. We maintain electronic and physical safeguards that comply with federal regulations and leading industry practices to safeguard your nonpublic personal information.

TO LIMIT OUR SHARING

Call WCCFCU at (330) 669.2117 (Smithville) or (330) 682.2117 (Orrville) to request to opt-out of sharing. If you leave a message, include name and phone number that we may call you back to confirm. You may email your request to opt-out of sharing to WCCFCU at info@wccfcu.com (and include your name and we will email you back to confirm the email request).

Please note: If you are a new member, we can begin sharing your information on the day you receive this notice. When you are no longer a member, we continue to share your information as described in this notice. However you may contact us at any time to limit our sharing.

PROTECTING THE PRIVACY OF CHILDREN'S INFORMATION

Our online financial services are not designed for or directed toward children. We do not knowingly solicit or collect data from children and we do not knowingly market any service or product to children online. We recognize that protecting children's identities and online privacy is important, and that the responsibility rests with us and the parents.

WHAT MEMBERS CAN DO TO HELP PROTECT THEIR INFORMATION

Wayne County Community Federal Credit Union is committed to protecting the privacy of its members. Members can help by following these simple guidelines:

- Protect your account numbers, plastic card numbers, PINs (personal identification numbers), or passwords. Never keep your PIN with your card, which can provide free access to your accounts if your card is lost or stolen. Choose your PIN carefully, and avoid using a PIN related to your address, DOB, telephone number or SSN.
- Use caution when disclosing your account numbers, social security numbers, etc. to other persons. If someone calls or texts you explaining the call is on behalf of the Credit Union and asks for your account number, you should beware. Official Credit Union staff will have access to your information and will not need to ask for it.
- Keep your information with us current. If your address or phone number changes, please let us know. It is important that we have current information on how to reach you quickly. If we detect potentially fraudulent or unauthorized activity or use of an account, we will attempt to contact you immediately (but we will not be asking for your card or account information). If deemed necessary in extreme situations, we may block your card before we are able to notify you in person, by phone or by mail or email.
- If you will be traveling for an extended period, or travelling out-of-state or out-of-country, please let us know. This may help explain unusual or out-of-the-ordinary transactions on your account or card with us, and prevent your card from being blocked.
- Never give out your account number to anyone that calls you on the phone or texts you, especially when they use "scare tactics" like saying your card may be blocked. Remember, companies already have your account number or card number or Social Security Number. You don't need to provide that information to them. Furthermore, never give your PIN number to someone over the phone. Financial institution employees do not have access to your PIN, and should never ask for it.

Let us know if you have questions. Please remember to not give any personal information to anyone you question has a legitimate reason to obtain that information. Call us on our published number if you are unsure.

Occasionally, our fraud detection service may **call** you regarding a specific transaction where your card was used. You may be asked to confirm a merchant/vendor and a transaction dollar amount (such as "XYZ Airlines for \$488.66") to determine if the transaction is a valid one. But again, you will not be asked to give specific account or give your card information.

INTERNET PRIVACY DISCLOSURE

Every computer on the Internet is identified by a unique number called an IP (Internet Protocol) address which is assigned each time you connect to the Internet. When you visit any website, your IP address is recorded. Wayne County Community Federal Credit Union (WCCFCU) collects site management information for statistical purposes only to create summary statistics. These summary statistics are used for the purpose of assessing what information may be more interesting or less interesting, determining best design and technical specifications, monitoring system performance and detecting any problem areas. In addition, we do not monitor your Internet activity. No information which would identify you personally is collected or used for any of these purposes.

If you send us any information voluntarily from one of our web forms, we will collect and use the information to respond or act on your request, and may store these requests to provide us with information for possible future improvements to our web site (www.wccfcu.com). WCCFCU never sells member information nor creates individual profiles with the information you provide. To provide you with greater access to information, our site contains links to other sites. These sites are not owned, operated, or maintained by WCCFCU, and we do not endorse nor are we responsible for the products or services they promote.

You are responsible for viewing and abiding by the privacy statements and other terms and disclosures posted on the third party sites. We reserve the right to change our privacy policy and this privacy notice from time to time without prior notice to you, unless prior notice is required by law.

MEMBER SERVICE DENIAL & EXPULSION POLICY

The funds that a credit union holds belongs to its members. When a particular member causes the credit union to suffer a loss, that loss is borne by all members of the credit union. In light of this, Wayne County Community Federal Credit Union (WCCFCU) has a "Member Credit Denial Policy" and a "Member Expulsion Policy" to deal with members who are indebted to the credit union and who cannot, or will not, repay their outstanding obligations.

Member Credit Denial Policy

WCCFCU may deny credit to any member of Wayne County Community Federal Credit Union who has caused the credit union a loss and who either: a.) has not voluntarily repaid the credit union for this loss, or b.) is not in the process of voluntarily repaying the credit union for this loss, will not be eligible for future credit at this credit union.

WCCFCU does extend credit to members who have caused the credit union a loss (including due to bankruptcy), but because the credit union is a cooperative financial institution comprised of its members' funds (personal earnings), it therefore will not extend further credit to a member who has caused the credit union a loss and who either has not voluntarily repaid the credit union for that loss, or is not in the process of voluntarily repaying the credit union for that loss.

Member Expulsion Policy

Credit Union losses may be incurred by unpaid loans, but losses can be incurred by returned checks, service fees, etc. which is also cause for member expulsion. For purposes of this policy, cause is defined as causing the credit union any loss in excess of an amount equal to \$50 or greater and who either a.) has not voluntarily repaid the credit union for that loss, or b.) is not in the process of voluntarily repaying the credit union for that loss, may be expelled from the membership of the credit union.

Furthermore, WCCFCU reserves the right to have a safe and secure environment and workplace for members and employees, and WCCFCU reserves the right to restrict or prohibit individuals from our lobbies and grounds that exhibit, display or infer abusive behavior or inappropriate conduct. This may include but is not limited to: foul or abusive language, threatening employees or members, assaulting or striking employees or members, vandalism, damaging property, attempts of fraud or identity theft. Member expulsion or service denial is at the credit union's discretion. Expulsion or service denial does not amend or eliminate any contractual responsibility (i.e. loans, agreements, etc.) with the credit union or other parties.