

Privacy Policy

It is the policy of KUE Federal Credit Union (the "Credit Union") that both the financial records of our customers and the relationships between the Credit Union and our customers are confidential, and that customer non-public personal information shall not be disclosed to third parties without first providing a privacy notice compliant with Regulation P, 12 CFR 1016, subject to the exceptions provided in Regulation P, summarized below:

Section 13 permits the Credit Union to provide consumer information to a non-affiliated third party to perform services for the Credit Union or functions on the Credit Union's behalf, if the Credit Union has provided the privacy notice to the consumer and the Credit Union has entered into a contract with the third party. The contract must require the third party to maintain the confidentiality of the information to at least the same extent that the Credit Union must maintain its confidentiality. The contract also must limit the third party's use of the information solely to the purposes for which the information is disclosed or for permitted purposes under Section 14 or 15.

Section 14 permits the Credit Union to provide information about a consumer to a non-affiliated third party without providing the affected consumer either the privacy notice or the opt out notice when the information is provided to service or process a financial product or service requested or authorized by the consumer. It also allows providing information to a non-affiliated third party as necessary to carry out a transaction for a consumer or to administer or maintain the product or service of which the transaction is a part.

Section 15 provides additional exceptions under which the Credit Union may disclose consumer information to non-affiliated third parties to whom consumer information may be disclosed that do not have to be described in the Credit Union's privacy notice and from which the consumer may not opt out.

This list includes:

- Information disclosures made with the consent of or at the direction of the consumer, provided that the consumer has not revoked the direction or consent.
- Information disclosures to protect the security of the Credit Union or the confidentiality of its records, or to protect against actual or potential fraud or unauthorized transactions, to control risk, or to resolve consumer disputes or inquiries.
- Information disclosures to persons holding a legal or beneficial interest relating to the consumer or persons acting in a fiduciary or representative capacity relative to the consumer.

- Information disclosures to the Credit Union's attorneys, accountants, auditors, agencies rating the Credit Union or agencies assessing the Credit Union's compliance with industry standards.
- Information disclosures specifically permitted or required by law (and in compliance with the Right to Financial Privacy Act) to the federal government.
- Information provided to a consumer reporting agency in accordance with the Fair Credit Reporting Act.
- Information disclosed to a non-affiliated third party in connection with the proposed or actual sale, merger, transfer, or exchange of a Credit Union.
- Information disclosed to comply with a properly authorized subpoena or summons, or to regulatory authorities having jurisdiction over the Credit Union.

We may collect information regarding your mobile device such as device settings, unique device identifiers, information about your location, and analytical information that may assist with diagnostics and performance. For your convenience, you may be asked to grant permission for access to your mobile device's geolocation data. This information may be collected when you use certain services that are dependent on your mobile device's location (such as the location of an ATM or in store transactions).

For purposes of compliance with Section 314(b) of the USA Patriot Act, no employee other than the Credit Union's CEO/GM shall divulge financial information or records of a customer to anyone outside the Credit Union. It is also the policy of the Credit Union to cooperate with governmental agencies in their properly made, legitimate requests for information.

The CEO/GM will be responsible for coordinating and monitoring compliance, including the training of employees on the regulation's requirement.

Periodic training will be conducted for all employees regarding compliance and related operating procedures. The importance of maintaining the confidentiality of member information will be addressed. Any employee breach of the privacy program is treated with the seriousness accorded to any violation of security and is grounds for disciplinary action, including dismissal.