

SCORE FEDERAL CREDIT UNION FINANCIAL PRIVACY POLICY

1. General Policy. SCORE Federal Credit Union is committed to making available financial products and services that will enable our members to meet their financial needs and reach their financial goals. Protecting personal information and using it in a manner consistent with our member's expectations are a high priority for everyone associated with the Credit Union. For the purposes of this policy, the term, "member" includes actual members and nonmembers who serve as co-applicants, co-borrowers or guarantors on loans. The Credit Union Board of Directors authorizes the release of information about members and nonmembers pursuant to the terms of this Policy and finds that the disclosure of such information is necessary for the purpose of meeting the needs of commerce and for fair and accurate credit information.

2. Compliance with the Law. SCORE Federal Credit Union adopts this Policy with the intent of complying with all applicable federal and state laws enacted as of the effective date of this policy including the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act, Chapter 717 of the NCUA Rules and Regulations and section 544.059, Florida Statutes/Section 7-1-360 of the Official Code of Georgia (as applicable). It is the intent of the Credit Union to comply with these laws so that the Credit Union is not considered a consumer reporting agency as defined by the Fair Credit Reporting Act.

3. Member Responsibilities. All members of the Credit Union have a responsibility and are expected to safeguard their personal and financial information.

4. Member Access. A member will always have the opportunity to review information about that particular member maintained at the Credit Union and make necessary changes to ensure that the Credit Union's records are complete and accurate.

5. Credit Union Officials. No Credit Union Officer, Director, Committee Member, Employee or Agent (hereafter "Credit Union Official") shall disclose any information regarding the Credit Union or its members to any person outside the Credit Union except as set forth in this policy. Information regarding the Credit Union or its members shall only be disclosed to other Credit Union Officials on a "need-to-know" basis. Violation of this policy is grounds for termination of employment or removal from office, as applicable.

6. Security. The Credit Union restricts access to information about members to those Credit Union Officials who need to know the information to provide products or services to the member. The Credit Union shall maintain and continue to develop physical, electronic and procedural safeguards that comply with all applicable federal and state regulations to guard personal information about members. A Credit Union Official who attempts to obtain or obtains

information for which they have not been authorized may be terminated from employment or removed from office as applicable.

7. Information the Credit Union Collects. The Credit Union only collects personal information that is necessary to conduct our business and provide members with competitive financial products and services. The Credit Union collects information from applications and forms submitted to the Credit Union, information about transactions between the member and the Credit Union and consumer reporting agencies.

8. Information the Credit Union Discloses. The Credit Union may disclose the following kinds of information:

- a. Information the Credit Union receives on applications or other forms, such as a member's name, address, social security number, assets, income and marital status;
- b. Information about transactions with the Credit Union, Credit Union affiliates, or others such as a member's account balance, payment history, parties to a transaction and credit card usage;
- c. Representations made by a member, such as the member's open lines of credit;
- d. Information obtained from a person regarding an employment, credit, or other relationship with a member, such as employment history; and
- e. Information from a consumer report or consumer reporting agency, such as creditworthiness, credit score and credit history.

9. Third Parties Who Receive this Information. The Credit Union will only share the information it collects about a member:

- a. when absolutely necessary to administer the products and services provided by the Credit Union;
- b. to financial service provider;
- c. to non financial companies;
- d. when we partner with other business to offer a broader array of products and services;
- e. when required or permitted to do so by law or the government.

10. Opting Out. In certain cases, individuals may have the ability to keep certain nonpublic personal information from being shared with certain third parties. In certain cases, individuals may have the ability to certain information from being shared with affiliates of the Credit Union including CUNA MUTUAL INSURANCE. The Credit Union will maintain procedures for members to exercise these choices, and the Credit Union will take all reasonable steps to ensure that a member's request is followed.

11. Member Authorization. The Credit Union is always permitted to disclose information about a member pursuant to that member's express written authorization.

12. Affiliations with Other Businesses. The Credit Union will only partner or affiliate with businesses that follow strict confidentiality requirements. The businesses selected by the Credit Union are and shall be selected to offer products designed to enhance the economic well-being of the members of the Credit Union.

13. Former Members. The credit Union will never share information about former members except as permitted or required by law.

14. Nonmember Consumers. The Credit Union will never share information with any other party about a nonmember (except nonmember co-borrowers or guarantors) who use a Credit Union service except as required by law.

15. Telemarketing. The Credit Union will not sell or provide information about Credit Union members to telemarketing firms that are not affiliated with the Credit Union.

16. Account Numbers. The Credit Union will not disclose the account number for any member to any nonaffiliated third party for use in any marketing effort. The Credit Union may disclose account numbers to (a) affiliates of the Credit Union, (b) nonaffiliated third parties that perform services or functions for the Credit Union' behalf, as long as the third party cannot directly initiate charges to a member's account, (c) to a participant in a private label credit card program, an affinity program or a similar program where the participants in the program are identified to the member when the member enters into the program, and (d) when the account number is in an encrypted form and the recipient third party is not given the means to decode the number.

17. Initial Notice. The Credit Union will provide an initial notice about this Policy to members when they join the Credit Union and to nonmembers who have loans that the Credit Union has purchased from another financial institution within a reasonable period of time after the loan is purchased.

18. Annual Notice. A summary of this Policy shall be made available to the members and nonmembers described in section 17 at least once each twelve months.

19. Federal Agencies. Before releasing any information regarding members to the Internal Revenue Service or any other federal agency, the Credit Union will contact its attorney for guidance in complying with the Right to Financial Privacy Act and other applicable law.

This Financial Privacy Policy is hereby adopted by the SCORE Federal Credit Union Board of Directors on the 22nd day of February, 2001.