

## Privacy Policy

Lanier Federal Credit Union recognizes its responsibility to protect the privacy of member nonpublic personal information. Lanier Federal Credit Union is committed to providing financial products and services that will enable our members to meet their financial needs and goals while at the same time protecting the members' personal information. It is the intent of Lanier Federal Credit Union to comply with all applicable laws and regulations governing the privacy of nonpublic personal information.

For the purpose of this Privacy Policy the following definitions shall apply:

**Affiliate** means any company that controls, is controlled by, or is under common control with another company. They can be financial or nonfinancial companies.

**Non-affiliate** means any company not related by common ownership or control. They can be financial or nonfinancial companies.

**Consumer** means an individual who obtains or has obtained a financial product of service from you that is to be used primarily for personal, family, or household purposes, or that individual's legal representative.

**Joint Marketing** means a formal agreement between non-affiliated financial companies that together market financial products or services to you.

**Nonpublic Personal Information** means personally identifiable financial information and any list, description, or other grouping of consumers (and publicly available information pertaining to them) that is derived using any personally identifiable financial information this is not publicly available.

**Personally Identifiable Financial Information** means any information a consumer provides to you to obtain a financial product or service from you or as a result from any transaction.

## Guidelines

To ensure that members can rely on the quality of products and services we make available, our credit union stands behind the following privacy guidelines:

- The credit union will only collect personal information necessary to conduct our business. That
  means only what is necessary to provide competitive financial products and services and no more.
  We collect this information about members from applications or other forms, information about
  member transactions with us, our affiliates or others, and information we receive from consumer
  reporting agencies.
- The credit union discloses nonpublic personal information about its members and former members to companies that offer financial products and services, including insurance products and securities brokerage companies. The credit union also discloses nonpublic information to other nonaffiliated third parties as permitted by law.
- The credit union will partner only with businesses that follow strict confidentially requirements.
   The businesses we select will offer products designed to enhance our members' economic well-

- being. Under no circumstances will we authorize those firms to charge a member's account without receiving their express consent, and we will not sell member information to telemarketing firms.
- Members that prefer that we not disclose nonpublic personal information about them to nonaffiliated third parties may opt out of these disclosures, and direct us not to make those disclosures to nonaffiliated third parties. To opt out, members may call us at 770-503-1765 during our regular business hours. Members may also notify us in writing by mailing a request to 3718 Mundy Mill Rd, Oakwood, GA 30566 or visit us online at <a href="www.lanierfcu.org">www.lanierfcu.org</a>. Also, by sending a secure message via our Home Banking page, or visiting one of our branches.
- The right to opt out does not apply if Lanier Federal Credit Union's disclosure of nonpublic personal information is necessary to effect, administer or endorse a transaction that a consumer requests or authorizes.

## **Confidentiality and Security Safeguards**

Lanier Federal Credit Union will protect the personal information of its members. This credit union will maintain strong security controls to ensure that member information in our files and computers is protected. We limit employee access to confidential member financial information to those employees with a business reason for knowing such information. Additionally, we maintain physical, electronic and procedural safeguards that comply with Federal regulations.

## **Disclosure of Privacy Policy**

**Lanier Federal Credit Union** will disclose its privacy policies as required by law. When a member relationship is established, or there is a change in the privacy disclosure, the completed model disclosure form will be provided to members in a conspicuous form that the member may keep.

Lanier Federal Credit Union will provide the annual privacy notice using the alternative delivery method. The alternative delivery method allows the annual privacy note to be provided by posting a conspicuous notice on the credit union's website. The following conditions for use of the alternative delivery method will be satisfied:

- No opt-out rights are triggered by the financial institutions' information sharing practices under the Gramm-Leach-Bliley Act or Fair Credit Reporting Act Section 603;
- The opt-out rights notices required by FCRA have previously been provided, or the annual privacy notice is not the only notice provided to satisfy the requirements;
- The information in the privacy notice has not changed since the member received the previous notice;
- Members will be informed annually about the availability of the privacy notice on regular communication, such as a monthly statement. The notice will inform members of their right to request a written disclosure by calling 770-503-1765. If requested, Lanier Federal Credit Union will provide a mailed privacy notice to the member with 10 days.

If the conditions for the alternative delivery method are not satisfied, the credit union will annually provide a mailed copy of the credit union's privacy policy.

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