

The Privacy Policy of SC Telco Federal Credit Union shall be determined by the Board of Directors. It shall be the responsibility of the Board, or its appointees or representatives to administer these policies in conformity with: the bylaws of SC Telco Federal Credit Union; the general statutes of South Carolina; and the rules and regulations the National Credit Union Administration.

SC Telco Federal Credit Union recognizes the importance of our members' privacy. As such, the Credit Union wants to protect the personal and financial information members have entrusted to us. The Board of Directors has adopted the following Privacy Principles that are intended to protect members' privacy.

PRIVACY PRINCIPLES

1. **Recognition of a Member's Expectation of Privacy.** SC Telco Federal Credit Union recognizes and respects the privacy expectations of our members.
2. **Use, Collection and Retention of Member Information.** SC Telco Federal Credit Union will collect, retain and use information about individual members in an appropriate and reasonable fashion. We generally limit our collection, retention and use to information we deem necessary or appropriate to administer accounts, to provide member services, to offer products to members, to make opportunities available to members, and to fulfill legal and regulatory requirements.
3. **Maintenance of Accurate Information.** SC Telco Federal Credit Union has established procedures to help ensure that a member's financial information is accurate, current and complete in accordance with reasonable commercial standards.
4. **Limiting Employee Access to Information.** SC Telco Federal Credit Union limits employee access to personally identifiable information to those with a business reason for knowing such information. We educate our employees so that they will understand the importance of confidentiality and member privacy. Credit Union employees are personally responsible for maintaining our member's confidence in SC Telco Federal Credit Union. Employees who violate these principles are subject to disciplinary action, including dismissal.
5. **Information Security Safeguards.** Access to member information is limited to those who specifically need it to conduct their business responsibilities; and we use appropriate security techniques designed to protect our members' financial information.
6. **Restrictions on the Disclosure of Account Information.** SC Telco Federal Credit Union will not reveal specific information about member accounts or other personally identifiable data to unaffiliated third parties for their independent use, except for the exchange of information with reputable information reporting agencies to maximize the accuracy and security of such information or in the performance of bona fide due diligence, unless: (1) the information is provided to help complete a member initiated transaction; (2) the member requests it; or (3) the disclosure is required by/or allowed by law (e.g.; subpoena, investigation of fraudulent activity, etc.).
7. **Maintaining Member Privacy in Business Relationships with Third Parties.** We expect third parties who assist us in providing products and services or information to our members to adhere to similar privacy principles that provide for keeping member information confidential.
8. **Disclosure of Privacy Principles to Member.** We have developed these principles, and share them with our members in light of member concerns regarding financial privacy.

Members should note that we cannot accept communications from someone claiming to represent the member, unless the party acting for the member is the member's attorney, guardian, trustee or is otherwise authorized by law to represent the member.

Information We Share with Consumer Reporting Agencies. It is commonplace for financial institutions like SC Telco Federal Credit Union to share information about member accounts with consumer reporting agencies. If a member believes some of the information we have shared or may share is in error, the member should let us know by writing to:

SC Telco Federal Credit Union, P.O. Box 10708, Greenville, SC 29603.

The member should provide the following information: complete name, current address, telephone number, and social security number. They will also need to include their account number, type of account and the specific item in dispute, along with the reason they believe this information has been reported in error. We will do our best to correct any error specifically relating to the information that we report.

PRIVACY POLICY

At SC Telco, trust has always been the foundation of our relationship with our members. Because you trust us with your financial and other personal information, we are committed to respect your privacy and safeguard that information. To preserve your trust, we pledge to protect your privacy by adhering to the practices described below.

By signing any application or agreement with us, or your use or continued use of any of our services with after receiving this document, you jointly and severally agree to the terms and conditions set forth in this Policy and Agreement.

- 1. The Categories of Information We Collect.** We only collect information about our members for lawful business purposes, or as otherwise required by applicable law. We maintain strict security procedures to protect your information. We collect information about members from the following sources: (a) Information we receive from you on applications and other forms such as your name, address, social security number, assets and income; (b) Information about your transactions with us, our affiliates, and others such as your account balance, payment history, parties to your transactions and credit card usage; and (c) Information we receive from consumer reporting agencies regarding your creditworthiness and credit history, and (d) certain information when you visit our web site, such as date and time our site was accessed, the web browser used, and what pages were accessed.

You agree that the street and e-mail addresses provided in your Membership Application or any other application or notices accepted by us are publicly available and will be used to provide notices, disclosures, statements, other communications (including but not limited to our responses to your e-mail communications) and offers for certain products or services as explained in this Privacy Policy.

- 2. Categories of Information We Disclose.** We generally do not provide any non-public personal information about our members or former members, except as permitted by applicable law. However, we may disclose the non-public personal information we collect as described above to Financial Service Providers such as insurance agents, and to other non-affiliated third parties as permitted by applicable law.
- 3. Security.** We are committed to taking every reasonable precaution to protect individual identifying information that you provide to us. We restrict access to nonpublic personal information about you to employees who need to know that information to provide products or services to you. We also maintain physical, electronic and procedural safeguards that comply with federal regulations to guard your non-public personal information.

Our Internet banking service provider, FundsXpress, has also developed security policies and procedures to protect the member information that they must collect and maintain to help us process your banking transactions over the Internet. They have developed a top-of-the line security system to ensure your member information is protected on the Internet and within the FundsXpress environment. For more information on the FundsXpress security measures, go to www.sctelcofcu.org and click on the FX security link.

4. **Notices and “Joint Relationships.”** Except where expressly required by applicable law, we will provide all other notices, including opt-out notifications if required, to the member listed first on any application, agreement, or other document. If this member has agreed to receive notices and disclosures electronically, then we can send all such notices and notifications, including but not limited to appropriate opt-out forms, to the e-mail or internet address provided by that said person. All joint owners, borrowers and guarantors agree to the receipt and sufficiency of any notice or notification sent according to this paragraph.
5. **Modification.** The Credit Union reserves the right to modify, change or amend this Privacy Policy and Agreement at any time without notice other than as expressly required by the applicable law.
6. **Pre-Approved Credit Solicitations.** If you would like to have your name taken off all pre-approved credit solicitations (not just Credit Union offers), you can write to the following credit reporting agencies. Please be sure to include your name, current address and social security number.

Experian Consumer Opt-Out P O Box 919 Allen TX 75013	Options Equifax, Inc. P O Box 740123 Atlanta GA 30374-0123	Trans Union Corporation Name Removal Option P O Box 97328 Jackson MS 39288-7328
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7. **Online Privacy Guidelines.**

Protecting information online. Whether you are a current member or just visiting us online, we safeguard the information you provide to us at www.sctelcofcu.org. How we use and protect this information is described below:

a. External 3rd party links. Our web site has a number of links to other 3rd party sites. These links to external third parties are offered as a courtesy and a convenience to our members. SC Telco Federal Credit Union is **not responsible** for the privacy practices or the content of such web sites.

Third party merchants may collect personal information from you when you visit their sites. For example, they collect personal information from you when you provide billing information. They may also collect information from you if you send them an e-mail. Some third party merchants may also send you a cookie to collect data on your Internet usage preferences. When you click on advertisements at third party sites, the advertising company may also send you a cookie. SC Telco Federal Credit Union does NOT have access to this information, nor can we control how they use this information. **As a general rule, you should always look for and review a site’s privacy policy before giving out any personal information.**

If you have questions or concerns about the privacy policies and practices of these third parties, please review their web sites and contact them directly. SC Telco Federal Credit Union assumes no responsibility for the content, safety, security, or privacy of any such site or any transactions you conduct through them. However, if you need any assistance in contacting these third parties, or if you have any concerns regarding unauthorized access to your accounts or financial institution credit cards, please contact your local branch or our Call Center at 1-800-922-0446.

b. Protecting online applications. When you apply online for accounts or services, or enroll in our home banking services, you provide personal information that is necessary for us to process your application. To ensure that your application remains confidential, the information is sent to us in a “secure session”. After you have submitted your application online, we recommend that you end your browser session before leaving your computer. We, along with the outside companies with which we work, if applicable, may keep the information the application provided to us, along with information we collect from outside sources, so that we can offer you accounts and services related to your financial needs.

c. Collection information. Our Internet financial services provider, FundsXpress Financial Network, Inc. (“FundsXpress”), also collects and maintains certain information about our members simply to help us provide financial service to you online. They may also collect certain information for security and statistical purposes. The information collected may include:

- The internet address (referral site) which brought you to our web site.
- The date and time you access our site.
- The name and version of your web browser.
- Your Internet Protocol (IP) address.
- Content of cookies sent by FundsXpress.
- The pages visited on our web site.

The information collected on the pages you visit is used only for statistical purposes and is tied only to your IP address.

d. Internet Protocol (IP) addresses. An IP address is a number that is automatically assigned to your computer whenever you are surfing the Web. Web servers – the computers that “serve up” Web pages – automatically identify your computer by its IP address.

FundsXpress does not link IP addresses to anything personally identifiable, which means that a user’s session will be logged, but the user remains anonymous to us and FundsXpress.

FundsXpress may use IP addresses to audit the use of our site. FundsXpress and will use IP addresses to identify a user when necessary for security purposes.

e. Visitors to the web site. Visitors to our web site remain anonymous. We do not collect unique identifying information about you unless you voluntarily and knowingly provide us that information, and we do not send you a “cookie.”

FundsXpress does collect and disclose general information to us about your visit, such as when you accessed our site, which pages you accessed in our website, and what Internet provider you used when you accessed our site.

You may elect to provide us with more specific information, such as when you give us feedback or send us an e-mail. If you provide us this information, it is only used internally and in furtherance of the purpose for which it was intended.

We do not disclose or sell to any third party information that we collect or that is provided to us from visitors to our web site. We do not send advertisements or e-mail to someone who just visited our web site.

f. Use of Cookies. Internet Banking: When you log on to our Moneylink Online, our service provider, FundsXpress, passes a cookie to your browser. The cookie only identifies your computer. FundsXpress does not (and cannot) use cookies to collect or obtain new personal information about you.

This cookie allows FundsXpress to process multiple transactions during your session without requiring you to reenter your passcode for each individual transaction. The cookies for Moneylink Online banking simply provide another level of security for our Internet banking product.

The FundsXpress Internet banking product uses encrypted cookies that do not pass to your hard drive. Instead, the cookie is stored in the memory of your browser, identifying your computer while you are logged on. Only FundsXpress can read the information in these cookies. When you log off, close your browser, or turn off your machine, the cookie is destroyed. A new cookie is used for each session. That way, no one can use the prior cookie to access your account. For additional security, the cookie expires after 10 minutes of inactivity. It must then be renewed by reentering your passcode.

Protecting Children. We do not knowingly solicit or collect data from children and we do not knowingly market to children online. We recognize that protecting children’s identities and online privacy is important and that responsibility rests with us and with parents.

July, 2006