

# Finance Center - Privacy and Security Policies

Effective March 15, 2006

## Finance Center Privacy Policy

This Financial Institution is firmly committed to the privacy and security of your personal information collected in the Finance Center. With that in mind, we have developed this Privacy Policy and list of frequently asked questions to explain the type of information we collect in the Finance Center, as well as how we use and protect the information from unauthorized disclosure.

In particular, we only collect your personal information as necessary to provide Finance Center service. We will not sell your personally identifiable data to any third party; we will not contact you without your prior permission unless required for Support; and no employee of this Institution or its Service Providers can view or retrieve your passcode(s) or other personal information within the Finance Center. The Service Provider(s) we partner with to provide the Finance Center have established security policies and controls to protect your confidential information from unauthorized use. These policies and controls are further described below in our Security Policy.

## Frequently Asked Privacy Questions

1. What categories of personal information does the Finance Center collect?

This Institution and its Service Providers ("we") collect the following categories of personal information about you through the Finance Center:

**Registration Information:** When you enroll for the Finance Center, you will be asked for basic information such as: your Internet banking passcode with this Institution; account numbers, user names, passcodes with third party account providers.

**Information regarding your use of the Finance Center:** As with most online businesses that must meet auditing requirements, the Finance Center logs information about your access and use of the Finance Center website, including: (i) the IP addresses from which you came to the site and (ii) emails or secure messages sent to us regarding the Finance Center service and/or our website site. In the event transactional capability becomes available in the Finance Center, we will also log information about transactions conducted through the Finance Center.

**Information From Third Party Websites:** In order to display information to you through the Finance Center, we must collect, on your behalf, your account and other personal information from third party website sites that you enroll in the Finance Center. For example, if you enroll a credit card account through the Finance Center, we will collect your credit card transactional and payment information to display it to you in the Finance Center.

2. How does Old Hickory Credit Union and its Service Providers use my personal information gathered through the Finance Center?

Your personal information will never be sold to any affiliated or unaffiliated third party. Information may be disclosed or shared with third parties only (i) as necessary to provide the Finance Center services to you, (ii) pursuant to joint marketing arrangements described below, or (iii) as required or permitted by law.

In order to display your consolidated financial information in the Finance Center, we will use your access Id and/or user names and your respective passcode(s) (collectively referred to as "login

information”) to access the third party websites that you enroll for the service. Such websites may include those operated by your Credit Card Company, brokerage firm, or bank. Per our agreement with you, we will only use your login information to obtain information from this Institution and the third party account providers that you enroll in the Finance Center.

We may disclose your personal information with affiliated or nonaffiliated third parties as required by law to respond to a subpoena, to protect and defend the rights and property of this Institution and its Service Providers.

We may also disclose enrollment information and/or information regarding use of the Finance Center (excluding transactional information on your aggregated accounts) to companies and/or financial institutions that perform marketing or research services on our behalf.

We may also use the data within the Finance Center to compile aggregate statistics on use of the Service such as; the average number of accounts per member enrolled in the Finance Center.

3. Will I be contacted if I enroll for the Finance Center?

This Institution and/or its Service Providers may contact users by electronic mail when necessary to service or maintain the enrolled account(s). We may also use the secure messaging feature of our Internet banking product to send you important messages regarding the Finance Center.

4. Does the Finance Center Service use cookies?

The Finance Center does not use cookies. The only cookie used in connection with the Finance Center is the Internet banking session cookie which is used for security purposes when you login to the Internet banking service. If you do not have cookies enabled you will not be able to access the Internet banking service or the Finance Center.

A session cookie is simply a text file, which indicates your session identification number. This cookie is encrypted and only stored in your computer’s memory. This cookie is destroyed when the session ends or you close your browser.

We reserve the right to use cookies to deliver content specific to your needs and interests. We also reserve the right to use cookies to track user trends and patterns within our website site and the Finance Center in order to better understand and improve areas of our sites that our users find valuable.

5. How is my personal information protected and secured?

At Old Hickory Credit Union, our number one focus is member trust. We understand the need for our member's personal data to be completely secure and private; thus we require our Service Providers to maintain physical, electronic and procedural safeguards that comply with industry and federal standards to guard your personal information. Our Service Providers employ the latest in security-based technology to protect your information in the Finance Center.

The Finance Center database is electronically and physically protected at a secure, third party site and is monitored by security personnel twenty-four hours a day. Only authorized personnel can access the data center and/or the database servers.

To learn more about the security measures used in the Finance Center, please review our Security Policy, which is further detailed below.

6. Does this Privacy Policy apply to third party account providers accessed through the Finance Center?

No. This Privacy Policy only applies to this Institution and our Finance Center. This Privacy Policy does not apply to other website sites and/or third party account providers accessible through our website or the Finance Center. This Institution and its Service Providers act as your personal agent, communicating between you and the websites you have enrolled in the Finance Center service. Neither this Institution nor its Service Providers accept responsibility for the services, actions and policies of third party account providers accessible through the Finance Center, including but not limited to, personal information you have provided to them, or which you authorize us to give to them for accessing their websites, or which they obtain through your use of their websites directly and/or through the Finance Center. We strongly suggest that you carefully review all privacy policies posted on third party websites before signing up with or using them.

7. Who can I contact if I have any questions regarding my privacy?

You can contact this Institution for any questions or suggestions. Please use the "Contact Us" form in User Services section of our Internet banking service. You can also call us at 1-800-998-4043 or 1-615-847-4043

8. How is personal information on former users of the Finance Center treated?

The terms of this Privacy Policy will also apply to personal information of former users of the Finance Center. As stated in our Security Policy, when we receive a request to discontinue the Finance Center service, the user's personal information will be securely and permanently deleted from our Service Provider's database servers.

9. How will I be informed of changes to the Privacy Policy or receive future disclosures?

We reserve the right at our discretion to make changes to this Privacy Policy. If changes to this policy materially or adversely affect the collection, storage, use or disclosure of your personal information, we will provide advance notice of the policy changes through email. We may also send you a secure message through our Internet banking service. If required by law, we will also provide you an opportunity to opt-out of the disclosure of personal information except as previously described above, (e.g. when we provide information to service providers, when data is disclosed in aggregate format, or when we must disclose information for legal and audit purposes).

Our most current Privacy Policy and terms and conditions will always be available on our website. When you enroll for the Finance Center, you agree to accept electronic communications and/or postings of annual or revised Privacy Policies on our website, and that such electronic communications or postings constitute notice to you. If you need a paper copy, contact this Institution at 1-800-998-4043 or 1-615-847-4043.

10. How will disputes regarding the Privacy Policy be handled?

If you have a problem or dispute with this Institution regarding this Privacy Policy or the treatment of your personal information, the problem or dispute will be subject to both this Privacy Policy and the terms and conditions governing the Finance Center in general. Please contact us if you have any questions or concerns 1-800-998-4043 or 1-615-847-4043.

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## Finance Center Security Policy

Old Hickory Credit Union and our Service Providers employ leading-edge technologies, standards and business practices to protect your data. We utilize Service Providers to assist us in providing various Internet banking services, such as the Finance Center.

The key components of Finance Center security discussed within this policy include:

- Account Data and Passcode Protection
- Network Intrusion Detection Systems and Firewalls
- Physical Security Measures
- Rigorous Audits and Inspections
- Other Frequently Asked Security Questions

### 1. Account Data and Passcode Protection

Account data and passcode(s) are stored and transmitted in an encrypted format at all times.

**Transmission of Account Data:** When you enter your personal information in the Finance Center, the information is entered through Secure Socket Layer (SSL), which creates an encrypted (128 bit) session between your browser and our servers. The transmission is protected using industry recognized encryption standards.

When account data is retrieved from your third party account providers, the information is also retrieved through an SSL session; unless your third party provider does not support SSL.

User credentials such as your passcode(s) and access IDs are transmitted in an encrypted format via the SSL session.

**Storage of Account Data:** User account information and passcodes are stored in our Service Provider's database using strong, industry recognized encryption standards. Neither the employees of this Institution nor the employees of our Service Providers have access to your encrypted passcode(s).

No one can access your account(s) within the Finance Center unless you provide him or her with your access ID and passcode information.

### 2. Network Intrusion Detection Systems and Firewalls

Our Service Providers use network-based IDS (intrusion detection systems) and firewalls to prevent unauthorized access to the Finance Center and provide 24x7 network monitoring. The firewall and IDS combination provide protection against and notification regarding the presence of harmful or hostile network traffic.

### 3. Physical Security Measures

The Finance Center is hosted in a secure third-party data center. Security personnel monitor the system 7 days a week, 24 hours a day. The third-party data center provides enhanced physical security, fire protection and electronic shielding. Access to servers requires multiple levels of authentication including biometric procedures.

#### 4. Rigorous Audits and Inspections

The security infrastructure is regularly audited and inspected by industry-leading third party auditors, regulators, and security experts.

#### 5. Other Frequently Asked Security Questions

How can I be sure that I'm communicating with the Finance Center instead of a spoofed site?

You must login to the Finance Center through our Internet banking product. Additionally, the Finance Center uses Thawte certificates. You should always view the certificate information in the locked key symbol to ensure that you are communicating with the Finance Center servers. The URL on the certificate will always be <https://financecenter.fxfn.com>.

What is my liability if my account information is compromised?

Under applicable banking regulations, if someone has gained access to your user name, PIN, or passcode, or if a transfer or withdrawal from your account provider is incorrect, the extent of your liability for an unauthorized transaction is determined by your promptness in notifying the account provider. Quickly notifying the account provider limits your liability. See your applicable user agreement from your account provider for your funds transfer enabled accounts for details on your responsibilities.

It is very important that you tell your account provider at once if you believe your ID and/or passcode has been compromised, or if someone has transferred or may transfer money from your account(s) without your permission. In such a circumstance, the best way to minimize your loss is to immediately contact your account provider.

What happens to my account information if I unsubscribe from the service or just stop using it?

Once your request to unsubscribe has been received, your information will be securely and permanently deleted from our database.

Is my account information protected during a "service outage" or "scheduled maintenance"?

In the event that the service is temporarily unavailable, your account information remains secure in and is protected by stringent network-based and physical security measures.