

# Privacy Policy

Rev. 2/17

<b>FACTS</b> WHAT DOES CPM FEDERAL CREDIT UNION DO WITH YOUR PERSONAL INFORMATION?		
<b>Why?</b>	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.	
<b>What?</b>	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> <li>▪ Social Security number and account balances</li> <li>▪ credit history and credit scores</li> <li>▪ income and payment history</li> </ul>	
<b>How?</b>	All financial companies need to share members' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their members' personal information; the reasons CPM Federal Credit Union chooses to share; and whether you can limit this sharing.	
<b>Reasons we can share your personal information</b>	<b>Does CPM Federal Credit Union share?</b>	<b>Can you limit this sharing?</b>
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or to report to credit bureaus	Yes	No
For our marketing purposes – to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	Yes
For our affiliates' everyday business purposes – information about your transactions and experiences	No	We don't share
For our affiliates' everyday business purposes – information about your creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For nonaffiliates to market to you	No	We don't share
<b>To limit our sharing</b>	<ul style="list-style-type: none"> <li>▪ Call toll-free (800) 255-1513 - our menu will prompt you through your choice(s) or</li> <li>▪ Visit us online: <a href="http://www.cpmfed.com">www.cpmfed.com</a></li> </ul> <p><b>Please note:</b> If you are a <i>new</i> member, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our member, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>	
<b>Questions?</b>	Call toll-free (800) 255-1513 or go to <a href="http://www.cpmfed.com">www.cpmfed.com</a>	

What we do	
<b>How does CPM Federal Credit Union protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
<b>How does CPM Federal Credit Union collect my personal information?</b>	We collect your personal information, for example, when you <ul style="list-style-type: none"> <li>▪ open an account or deposit money</li> <li>▪ pay your bills or use your credit or debit card</li> <li>▪ apply for financing</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
<b>Why can't I limit all sharing?</b>	Federal law gives you the right to limit only <ul style="list-style-type: none"> <li>▪ sharing for affiliates' everyday business purposes – information about your creditworthiness</li> <li>▪ affiliates from using your information to market to you</li> <li>▪ sharing for nonaffiliates to market to you</li> </ul> <p>State law and individual companies may give you additional rights to limit sharing.</p> <p>Your choices will apply to everyone on your account.</p>
<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices will apply to everyone on your account.
Definitions	
<b>Affiliates</b>	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>▪ <i>CPM Federal Credit Union has no affiliates.</i></li> </ul>
<b>Nonaffiliates</b>	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>▪ <i>CPM Federal Credit Union does not share with our nonaffiliates so they can market to you.</i></li> </ul>
<b>Joint Marketing</b>	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> <li>▪ <i>Our joint marketing partners include advertising/marketing agencies and insurance companies.</i></li> </ul>
Other important information	

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## Privacy Policy

Trust has always been the foundation of our relationship with 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 the 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 you 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; (c) Information we receive from consumer reporting agencies regarding your credit worthiness and credit history; (d) Information we receive from Internet "cookies" such as, name, account number, and your transactions with us.

You agree that the street and email addresses provided in your Signature Card 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 product or services as explained in the Privacy Policy.

*2. Categories of Information We Disclose. We generally do not provide any non-public information about our members or former members, except information necessary to effect, administer, or enforce a transaction that a member requests or authorizes or other non-affiliated third parties 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 companies, brokerage firms, real estate settlement services, appraisers and loan underwriters.*

*3. Security. We are committed to taking every reasonable precaution to protect individual identifying information that you provide to us. We restrict access to non-public personal information about you to employees who need to know that information to provide products or services to you. Our employees are trained in the importance of maintaining confidentiality and member privacy. We also maintain physical, electronic and procedural safeguards that comply with federal regulations and leading industry practices to guard your non-public personal information. To protect our members' privacy we only work with companies that agree to maintain strong confidentiality protections and limit the use of information we provide. We do not permit these companies to sell to other third parties the information we provide.*

*4. Notices and "Joint Relationships". Except where expressly required by applicable law, we will provide all notices to the person (member) listed first on any application, agreement or other relevant document with us. The notice will be mailed to the address noted for said person on the application, agreement or other document. If this person (member) has*

*agreed to receive notices and disclosures electronically, then we can send all such notices and notifications to the e-mail or Internet address provided by 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. Disclosures of Information About Former Members. If you terminate your membership with CPM Federal Credit Union, we will not share information we have collected about you, except as permitted or required by law.*

*6. 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 applicable law.*

## **Kid's Club Online Privacy**

CPM Federal will never collect or share any information with anyone on any child without prior written authorization from your parents.

You will see the word "COPPA" further down in this text. It stands for "Children's Online Privacy Protection Act." Former President Clinton signed this Act into law on October 21, 1998; and, after careful research and deliberation, the Government announced (on April 21, 2000) specific rules that sites like the Savings Safari Kid's Club Page must follow. These rules require us to give you, and your parents the following information:

*1. When you visit our site, we do not collect any personal information about you. (We never did, even before COPPA was established). Since we do not ever collect personal information, we do not need to tell you about other COPPA rules. However, if you or your parents would like to read more about COPPA, please go to the [Federal Trade Commission's website](#).*

*2. Please note that our computer automatically knows the address of the computer you are using (which includes the name and domain from which you access our Web site), the date and time that we sent the pages to you, and the address of the Web site that referred you to us. This information is used by us only to evaluate how useful our Web pages are to users like you.*

*3. If you send us an e-mail, you identify yourself to us. This is your choice and that of your parents. For instance, if you send us an e-mail message asking us for help with your school project - or for help with locating certain information on our Web site, we will see your e-mail address. However, we guarantee you that we do not release such information to other*

people. We only respond to you.

4. *Cookies.* (We are talking about the kinds of cookies that you can't eat.) The CPM Federal Maxx Money Club Page does not use cookies. But maybe you are interested in what a cookie is. If so, read on.

A "cookie," in the computer world, is a small text file that a Web site can place in your computer's memory (or in its own). These "cookies" contain certain information about your Web activities - information that is used when you return to the site. For instance, let's say you really like music, and your parents give you permission to order some music CDs over the Internet. While you are ordering, the music CD Web site "sets" a cookie. Next time you visit this site, it looks at the cookie to remember what type of music you ordered the last time, so that it can guide you back to the pages and type of music that you were interested in.

5. If you click on the other links we provide, you will leave the CPM Federal website and are subject to the privacy policy of the new site. We are not responsible for the content of these linked sites and only provide these links as a convenience to you. This does not mean that we endorse these linked sites.

If you need further information, please contact the CPM Federal Credit Union's Marketing Department by calling 1-800-255-1513 or by [email](#).

If any personal information is collected from a child under the age of thirteen (13) including name, address, phone number, e-mail address, etc., the information will not be sold to third party vendors. In addition, CPM FCU's website may include links to external web sites of others that are not associated with CPM FCU that provide educational resources or products for children. CPM FCU will complete due diligence prior to adding them to our website to ensure any links to sites comply with applicable law and COPPA.