

JDCU Privacy Policy

OUR PRIVACY PRINCIPLES

To serve our members as effectively as possible, we must make use of member information. At the same time, we want our members to be confident that their financial records and their relationship with us will be kept confidential. Therefore, we have adopted the following strong privacy principles to safeguard our members' non-public personal information:

1. **Recognition of Members' Expectation of Privacy**

We recognize and respect the privacy expectations of our members and will make the safekeeping of member information a priority.

2. **Use, Collection and Retention of Member Information**

We will collect, retain and use non-public personal information about our members only where we reasonably believe it would be useful (and allowed by law) to administer our business and to provide products, services and other opportunities to members.

We collect non-public personal information about our members from the following sources:

- information from applications or other forms
- information about member transactions with us
- information about member transactions with non-affiliated third parties
- information from a consumer reporting agency

We will not obtain personally identifying information about members when they visit our web site unless they choose to provide such information to us.

3. **Maintenance of Accurate Information**

We have established procedures to ensure that members' financial information is accurate, current and complete in accordance with reasonable commercial standards. Should we become aware of any inaccuracies in our records, we will take prompt steps to make appropriate corrections.

4. **Employee Education**

Our employees are educated on the importance of maintaining the confidentiality of member information and of privacy guidelines. In the event of a breach of privacy responsibilities by an employee, appropriate disciplinary action will be taken.

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5. Protection of Information via Established Security Procedures

We will maintain physical, electronic and procedural safeguards to guard against unauthorized access to member information.

For example, the applications and forms on our web site use Secure Socket Layer (SSL) technology to transfer member information across the Internet to us. This technology encrypts - or scrambles - the information members provide so it's virtually impossible for anyone other than us to read it. We use this technology whenever confidential information, such as account numbers or social security numbers, is requested. However, in some cases we give members the option of sending information to us in an unencrypted mode. Our Internet banking product will not allow our members to use a browser that does not support an adequate level of encryption.

6. Restrictions on the Disclosure of Information

We will not reveal specific information about members' accounts to unaffiliated third parties for their independent use. However, we recognize the following exceptions, permitted by law, and, therefore, may provide specific information when:

- it is needed to service or process financial products or services, or carry out transactions requested or authorized by members, including administering and maintaining the product or service related to the transactions
- we are expressly authorized to provide such information by the member
- we receive requests from an auditor or examiner, solely for the purpose of an official audit or accounting
- we receive requests from an attorney or collection agency in furtherance of a legitimate banking purpose, such as the collection of a member debt
- it is necessary to verify the accuracy of information provided to us with reputable information reporting agencies or merchants in accordance with standard banking industry practice
- we receive requests to confirm the availability of funds from parties who have accepted or have been asked to accept a check drawn on members' accounts with us
- we receive written requests from other financial institutions asking us for information where our members have applied for a product or service, and they have authorized this sharing

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- we must comply with certain laws that require mandatory disclosure of member information. In such instances, we will limit disclosure to what is required by law. For example:
 - if a member is involved in a legal proceeding, we may be compelled by court order or subpoena to produce records regarding that member's accounts or relationship with us
 - we are required by laws such as the Bank Secrecy Act, the Internal Revenue Code and the Right to Financial Privacy Act, under certain circumstances, to provide certain member information to government agencies.
7. **Maintaining Member Privacy in Business Relationships with Third Parties**
If personally identifiable member information is provided to a third party, we will insist, through a written agreement, that the third party adheres to strict privacy guidelines that provide for keeping such information confidential.