

# MEMBERS 1ST CREDIT UNION

## WEBSITE POLICY

New August 2016

Approved 12/13/2018

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### **POLICY**

Members 1st Credit Union (Credit Union) respects the personal and financial privacy of all members and are committed to protecting the information on and within the Credit Union's website. The Credit Union will ensure that its website complies with all applicable laws and regulations and will also monitor any changes in laws and regulations that affects the website, and update its policies, practices, and systems accordingly, in a prompt manner.

### **OVERVIEW**

The Credit Union has properly registered its website domain, members1cu.com, using the Domain Registration Service web.com. The site is developed and maintained by the Credit Union.

The Credit Union's website is an informational website in which no personal data will be submitted, collected, or requested.

The Credit Union's website offers links hosted by 3<sup>rd</sup> parties. Once members leave the Credit Union's website and enters the 3<sup>rd</sup> parties' websites, the member can opt to provide personal information in order to continue the transaction. Each one of the third party links will allow the member to have access to the hosting party's privacy and / or security statement.

The Credit Union website also provides several links that are informational only and where no personal information is submitted or requested. These links include Kelly Blue Book, Falcon Network ATM locator, and newsletters provided by Constant Contact (such as Family Money Magazine, Wallet Magazine, Modern Money and Financial Digest).

### **LINKS TO THIRD PARTY SITES**

The Credit Union has exercised due diligence in order to ensure that proper security measures are in place to protect member account information when entering any of the 3<sup>rd</sup> party sites. Each link provides the required language "You are leaving the website of Members 1st Credit Union. You are linking to an alternate website not operated by Members 1st Credit Union. Members 1st is not responsible for the content of the alternate website. Members 1st Credit Union does not represent either the third party or the customer/visitor if the two enter into a transaction. Privacy and security policies may differ from those practiced by Members 1st Credit Union".

### **RESPONSIBILITY**

The Credit Union CEO will make certain that the website is monitored periodically in order to safeguard against reputational risk. Only certain employees of the Credit Union will have access to the user name and password to access the website for changes and updates. Any changes or updates have to be authorized by the Credit Union CEO.

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### **AUDITS**

The Credit Union will regularly perform testing of its web site in order to identify and prevent potential vulnerabilities. The web site will also be subject to annual independent audits as required by Federal and State regulations. These audits will cover web site security, penetration testing, regulatory compliance, and maintenance. In the event that an issue of concern is uncovered by an audit, the Credit Union will correct the issue in a prompt manner.

### **PRIVACY**

Since the Credit Union's website is informational only, no personal information will be collected, sold, exchanged or released to any other third party.

### **E-TELLER**

When a member visits the Credit Union's online home banking site, E-Teller, the member will be required to enter a username and password in order to use the secure site. This information is held in strict confidence. While using E-Teller, certain online information, including the transaction activities, are recorded. This allows the Credit Union staff to confirm transactions. All member account information is housed on computers that are behind firewalls. All on-line transactions are authenticated and encrypted with the highest level of security protection available and the Credit Union uses industry-standard SSL encryption to protect data transmissions.

After logging in, an online "session" will time-out after 10 minutes of inactivity and will be automatically logged off. This prevents other individuals from accessing personal information in case the computer has been left unattended without logging out. When the member submits their password, it is compared with the password stored in the Credit Union's secure database. The online banking system will allow a member to attempt their password incorrectly three times. If the password is entered incorrectly more than three times, the member's access to E-Teller will be locked. In order to reactivate the account, the member can opt to click on the "Account Lockout Reset" link and answer the security questions in order to unlock their account or contact the Credit Union.

In the event that the member has forgotten the password, a link is provided to click on "Forgot my PIN". After answering the security questions, a message will appear, stating that "Your PIN has been reset. An email has been sent to the email address on file for the account with additional instructions to complete the reset".

### **EMAIL**

Certain areas on the website allow a member to submit information to the Credit Union via e-mail. The Credit Union will collect and retain the e-mail address, along with the information contained in the message. The Credit Union will use it primarily to follow-up with the member, to meet legal and regulatory requirements and research, and development purposes. E-mail is not a secure form of communication. The e-mail messages sent may not be secure against interception by unauthorized third

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parties. Therefore, a member should avoid sending any confidential or sensitive information, such as account numbers, and account balances, by e-mail.

### **CHILDRENS ONLINE PRIVACY PROTECTION ACT (COPPA)**

The Children's Online Privacy Protection Act (COPPA) was passed by Congress in October 1998, with a requirement that the Federal Trade Commission (FTC) issue and enforce rules concerning children's online privacy. The primary goal of the Act and the Rule is to place parents in control over what information is collected from their children online. The Credit Union's website is not designed for or directed towards children under the age of 13. The Credit Union does not solicit or collect personal identifiable information from children without parental or guardian consent. Should the Credit Union receive information from any child, the Credit Union will only use this information to respond directly to the child's request, notify parents, or seek parental or guardian consent.

### **INTERRUPTION OF SERVICE**

At certain times, Members 1st Credit Union may not be available due to system maintenance or circumstances beyond our control.

### **COOKIES ON WEBSITE**

Members 1st Credit Union does not utilize internet "cookies." Cookies are a feature of web browser software that allows web servers to recognize the computer used to access a website. They are small bits of data that are stored by a user's web browser on the user's hard drive. Cookies can remember what information a user accesses on one web page to simplify subsequent interactions with that website by the same user or to use the information to streamline the user's transactions on related web pages. Some of our associated companies may themselves use cookies on their own websites. The Credit Union has no access to, or control of these cookies, should this occur.