

# Eastern Corporate Federal Credit Union

## Privacy Notice

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Eastern Corporate Federal Credit Union (“EasCorp”) recognizes the importance of protecting the security and confidentiality of member information, including the personal and privileged information of our members’ natural person members. EasCorp collects nonpublic personal information about its members and their members (collectively “member personal information”) from information received on applications and other forms, as well as transactions with us and our affiliates.

12 CFR Part 748 (Security Program, Report of Suspected Crimes, Suspicious Transactions, Catastrophic Acts, and Bank Secrecy Act Compliance) of the National Credit Union Administration’s Regulations deems EasCorp a “service provider” for the purposes of this Privacy Notice. In order to implement the provisions of this and other applicable federal and state laws and regulations, EasCorp agrees to not sell, transfer, or disclose personal information provided by individuals to third parties other than our affiliates and our service providers who are under an obligation to maintain the confidentiality of such information. EasCorp will use such information exclusively for the purpose(s) for which it was provided, and to alert members to new, enhanced, or improved products or services, which we or our affiliates provide. To the extent that the European Union’s General Data Protection Regulation (“GDPR”) applies to any member personal information provided to EasCorp by its member credit unions (as a processor of Customer Personal Data under the GDPR), EasCorp will comply with the obligations applicable to it under the GDPR with respect to the processing of member personal information.

Section 501(b) of the Financial Service Modernization Act, also known as the Gramm-Leach-Bliley Act (“GLBA”), the National Credit Union Administration’s (“NCUA”) regulation 12 C.F.R. Part 748, and certain state laws and regulations require every credit union to develop an information security program that is designed to:

1. Ensure the security and confidentiality of member personal information;
2. Protect against any anticipated threats or hazards to the security or integrity of such information; and
3. Protect against unauthorized access to or use of such information that could result in substantial harm or inconvenience to any member.

As an NCUA regulated institution, EasCorp maintains appropriate security standards that include administrative, technical, and physical safeguards that comply with applicable federal and state requirements to protect the security and confidentiality of member personal information.

EasCorp requires all third party vendors and service providers, who handle member personal information on our behalf, to agree by written contract to follow reasonable and appropriate guidelines for security and confidentiality and to comply with applicable law. EasCorp also performs due diligence on such third party vendors and service providers for the adequacy of safeguards that protect member personal information.

EasCorp has an Incident Response Program in place that provides guidance for our response if a security incident occurs. If an incident occurs that involves unauthorized access to member personal information, EasCorp will take actions that it deems to be appropriate, including timely notification of security incidents as required by applicable law.

The retention and destruction of member personal information is subject to applicable federal and state laws and regulations. EasCorp will continue to maintain the appropriate security standards designed to protect the information it holds against unauthorized access and against unauthorized use until the date when deletion or disposal of the information occurs.

### **Contact Information**

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