

# Privacy Policy



101 Gray Rd  
Falmouth ME 04105  
PH: 207-878-3441  
FX: 207-878-5327  
www.mycfcu.com

Revised  
June  
2015

<b>FACTS</b>	<b>WHAT DOES CUMBERLAND COUNTY FEDERAL CREDIT UNION DO WITH YOUR PERSONAL INFORMATION?</b>		1	
<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.		2	
<b>What?</b>	<p>The types of personal information we collect and share depend on the accounts or services you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>• Name, address, Social Security Number, and income</li> <li>• Account balances and payment history</li> <li>• Credit history and credit scores</li> </ul>		3	
<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 Cumberland County Federal Credit Union chooses to share; and whether you can limit this sharing.		4	
	<b>Reasons we can share your personal information</b>	<b>Does Cumberland County Federal Credit Union share?</b>	<b>Can you limit this sharing?</b>	5
	<b>For our everyday business purposes</b> —such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No	
	<b>For our marketing purposes</b> —to offer our products and services to you	Yes	Yes	
	<b>For joint marketing with other financial companies</b>	Yes	Yes	
	<b>For our affiliates' everyday business purposes</b> —information about your transactions and experiences	Yes	No	
	<b>For our affiliates' everyday business purposes</b> —information about your creditworthiness	Yes	Yes	
	<b>For our affiliates to market to you</b>	Yes	Yes	
	<b>For non-affiliates to market to you</b>	No	We do not share	
<b>To limit our sharing</b>	<ul style="list-style-type: none"> <li>• Call 207-878-3441</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 you 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>		6	
<b>Questions?</b>	Call us at 207-878-3441 or visit us online at <a href="http://www.mycfcu.com">www.mycfcu.com</a> .		6	

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How does Cumberland County Federal Credit Union protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards, secured files and buildings, procedural safeguards and safe record storage. We will continue to review and modify our security controls in the future to deal with changes in products, services and technology.
How does Cumberland County Federal Credit Union collect my personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> <li>• open an account</li> <li>• apply for a loan</li> <li>• use your credit or debit card</li> <li>• pay your bills</li> <li>• make deposits to or withdrawals from your accounts</li> </ul> We also collect your personal information from others, including credit bureaus or other companies.
Why can't I limit all sharing?	Federal law only gives you the right to limit: <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 non-affiliates to market to you</li> </ul> State laws and individual companies may give you additional rights to limit sharing.
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account.

## Definitions 10

<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>Our affiliates include financial companies such as CUSO Mortgage Corp.</i></li> </ul>
<b>Non-affiliates</b>	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• <i>Cumberland County Federal Credit Union does not share with non-affiliates 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>Investment companies</i></li> <li>• <i>Insurance companies</i></li> <li>• <i>Other financial service providers</i></li> </ul>

**Effective Date: September 15, 2023**

## **BIOMETRIC INFORMATION PRIVACY POLICY AND CONSENT**

### **Scope and Overview**

This policy outlines how Cumberland County Federal Credit Union, its vendors, and/or the licensor of the Cumberland County Federal Credit Union's consumer verification software processes biometric data collected from you for identity verification and fraud prevention purposes.

### **Biometric Data Defined**

As used in this policy, biometric data includes "biometric identifiers" and "biometric information". "Biometric identifier" means a retina or iris scan, fingerprint, voiceprint, or scan of hand or face geometry. As the term is used in this policy, the selfie photograph you upload to the software for use in the biometric algorithm is considered a "biometric identifier." "Biometric information" means any information, regardless of how it is captured, converted, stored, or shared, based on an individual's biometric identifier used to identify an individual.

### **Disclosure and Authorization Policy**

To the extent that Cumberland County Federal Credit Union, its vendors, and/or the licensor of the Cumberland County Federal Credit Union's consumer verification software collect, capture, or otherwise obtain biometric data relating to a consumer, Cumberland County Federal Credit Union must first:

Inform each consumer that Cumberland County Federal Credit Union, its vendors, and/or the licensor of the Cumberland County Federal Credit Union's consumer verification software are collecting, capturing, or otherwise obtaining the employee's biometric data, and that the Cumberland County Federal Credit Union is providing such biometric data to its vendors and the licensor of the Cumberland County Federal Credit Union's consumer verification software;

Inform the consumer of the specific purpose and length of time for which the consumer's biometric data is being collected, stored, and used; and

Receive consent by the consumer authorizing Cumberland County Federal Credit Union, its vendors, and/or Cumberland County Federal Credit Union's consumer verification software to collect, store, and use the consumer's biometric data for the specific purposes disclosed by the Cumberland County Federal Credit Union, and for Cumberland County Federal Credit Union to provide such biometric data to its vendors and the licensor of the Cumberland County Federal Credit Union's consumer verification software.

Cumberland County Federal Credit Union, its vendors, and/or the licensor of the Cumberland County Federal Credit Union's consumer verification software will not sell, lease, trade, or otherwise profit from employees' biometric data; provided, however, that the Cumberland County Federal Credit Union's vendors and the licensor of the Cumberland County Federal Credit Union's consumer verification software may be paid for products or services used by Cumberland County Federal Credit Union that utilize such biometric data.

This policy is intended to comply with all federal, state, and local laws.

### **Purpose for the Collection of Biometric Data**

Cumberland County Federal Credit Union, its vendors, and/or the licensor of Cumberland County Federal Credit Union's consumer verification software collect, store, and use biometric data solely for identity verification and fraud prevention purposes.

### **Disclosure**

Cumberland County Federal Credit Union will not disclose or disseminate any biometric data to anyone other than its vendors and the licensor of the Cumberland County Federal Credit Union's consumer verification software providing products and services using biometric data without/unless:

First obtaining consumer consent to such disclosure or dissemination;

The disclosed data completes a financial transaction requested or authorized by the consumer;

Disclosure is required by law or ordinance; or

Disclosure is required pursuant to a valid warrant or subpoena issued by a court of competent jurisdiction.

### **Security**

Cumberland County Federal Credit Union shall use a commercially reasonable standard of care to store, transmit and protect from disclosure any biometric data collected. Such storage, transmission, and protection from disclosure shall be performed in a manner that is the same as or more protective than the manner in which Cumberland County Federal Credit Union stores, transmits and protects from disclosure other confidential and sensitive information, including personal information that can be used to uniquely identify an individual or an individual's account or property, such as genetic markers, genetic testing information, account numbers, PINs, driver's license numbers and social security numbers.

### **Retention**

Cumberland County Federal Credit Union shall retain consumer biometric data only until, and shall request that its vendors and the licensor of Cumberland County Federal Credit Union's consumer verification software permanently destroy such data when, the first of the following occurs:

The initial purpose for collecting or obtaining such biometric data has been satisfied, such as verification of consumer identity;

Request of consumer to destroy the biometric data; or

Within 30 days of consumer's provisioning of biometric data.

### **Contact Information**

If you have any questions about our use, storage, or security of your biometric data you can contact us at: [service@myccfcu.com](mailto:service@myccfcu.com).

### **BIOMETRIC INFORMATION CONSUMER CONSENT**

As outlined in the "Biometric Information Privacy Policy", I understand and consent to the collection, use, retention, storage, and/or disclosure or re-disclosure of data or images from biometric verification technology by Cumberland County Federal Credit Union, its vendors, and/or the licensor of the Cumberland County Federal Credit Union's consumer verification software. I acknowledge that I have been given a copy of the Policy, or that the Policy has been made accessible to me, and I have had an opportunity to review it and request any additional information concerning the Cumberland County Federal Credit Union's procedures and safeguards for collecting, maintaining, using, disclosing, sharing, storing, and/or destroying this data.