



## PRIVACY POLICY

Effective: August 21, 2001  
Revised: October 16, 2019, March 16, 2020,  
August 10, 2021

Green Mountain Credit Union is committed to making available financial products and services that will enable its members to meet their financial needs and goals. Protecting personal information and using it in a manner consistent with member expectations is a high priority to everyone associated with this credit union.

It is the intent of the Credit Union and any of its affiliates to abide by all applicable laws and regulations governing the privacy of nonpublic personal information including the Consumer Financial Protection Bureau (CFPB)'s Privacy of Consumer Financial Information rule (Regulation P), issued to implement the provisions of the Gramm-Leach-Bliley Act and the Right to Financial Privacy Act.

1. **DEFINITIONS.** For the purpose of this privacy policy, the following definitions shall apply.
  - A. **Affiliate.** To be considered an affiliate, the Credit Union must have the ownership, control or power to vote 25% of the shares; control election of a majority of the directors, trustees and partners; the power to exercise a controlling influence over the company's management or policies, or have any ownership interest in a company that is 67% owned by credit unions.
  - B. **Consumer.** A consumer is an individual, or such individual's legal representative or personal representative, who has obtained a financial product or service from the Credit Union for personal, family or household purposes or for whom the Credit Union is acting as fiduciary. A consumer is not necessarily a member of the Credit Union.
  - C. **Member.** A member is a consumer with whom the Credit Union has, or has had in the past, a continuing relationship where the Credit Union has provided one or more financial products or services for personal, family or household purposes.
    - a) Members as defined by the Credit Union's bylaws;
    - b) A nonmember joint account holder held with a member;
    - c) A nonmember who has a loan that the Credit Union services;
    - d) A nonmember who has an account with the low-income designated nonmember who has an account in a federally-insured state- chartered Credit Union pursuant to state law.

To ensure that members can rely on the quality of products and services we make available, our credit union stands behind the following privacy policy.

Green Mountain Credit Union will collect only the non-public personal information that is necessary to conduct our business and what is necessary to provide competitive financial products and services and no more. We collect this information about members from:

- Applications and other forms
- Information about member transactions with us, our affiliates or others
- Information we receive from consumer reporting agencies
- Information obtained when verifying the information, you provide on an application or other forms; this may be obtained from your current or past employers, or from other institutions where you conduct financial transactions

We may disclose nonpublic personal information about members to the following types of third parties:

- Financial service providers, such as insurance companies and mortgage service companies
- Non-financial companies such as consumer reporting agencies, data processors, check / share draft printers, plastic card processors and government agencies

The credit union may disclose nonpublic personal financial information about its members and former members that we collect, as described above, to companies that offer financial products and services, including insurance products, and those with whom we have joint marketing agreements. The credit union also discloses nonpublic information to other nonaffiliated third parties as permitted by law. These disclosures typically include information to process transactions on the members behalf, conduct the operation of the credit union, follow the member's authorized instructions, or protect the security of our financial records.

The credit union will partner only with businesses that follow strict confidentiality requirements. The businesses we select will offer products designed to enhance our member's economic well being. Under no circumstances will we authorize those firms to charge a members account without receiving their express consent, and we will not sell member information to telemarketing firms.

We will not disclose nonpublic personal financial information about members to nonaffiliated third parties, other than as permitted by law, unless the member authorizes us to make that disclosure. The authorization must be in writing or, if the member agrees, in electronic form. If the member wishes to authorize us to disclose nonpublic personal financial information to nonaffiliated third parties, the member may complete and sign a letter of authorization and mail or e-mail it to us.

Green Mountain Credit Union will protect the personal information of its members. We will not share information unless permitted by law or by the member. This credit union will maintain strong security controls to ensure that member information in our files and computers is protected. We limit employee access to confidential member financial information to those employees with a business reason for knowing such information. Additionally, we maintain physical, electronic and procedural safeguards that comply with state and federal regulations.

**MEMBERS' RIGHT TO "OPT OUT".** Privacy regulations allow members to "opt out" of having their information disclosed to non-affiliated third parties in certain situations. Before the Credit Union discloses any member information to a non-affiliated third party that is not otherwise covered by a disclosure exception in the regulation, the Credit Union will properly inform members of their right to "opt out" and to record and honor "opt out" requests. The opt out notice shall include the address and toll-free phone number of the appropriate notification system used for processing of notices of opt out and will be presented in a format acceptable to the National Credit Union Administration/Federal Trade.

Annual Notice. The Credit Union will provide a notice of the Credit Union's privacy policy to all members/consumers at least annually (once during any 12 consecutive months) if the changes are made to their policy or if the Credit Union provides an opt-out option. The Credit Union need not provide an annual notice to members or consumers who no longer have a relationship with the Credit Union.