



## Website Policy

SeaComm Federal Credit Union respects the personal and financial privacy of its members. We are committed to protecting the information on and within our website with the same safety and confidentiality standards utilized in the transaction of all SeaComm Federal Credit Union business.

### I. Purpose

- A. The website is a tool to provide
  - 1) Product and service information;
  - 2) Financial education;
  - 3) Timely information and alerts for our members;
  - 4) A portal to our secure online branch/NetTeller™ – Account Access & Bill Pay site.
  
- B. To provide comprehensive procedures on how SeaComm Federal Credit Union's website at [www.seacomm.org](http://www.seacomm.org) is managed to ensure accuracy, efficiency and compliance with all NCUA, state and federal laws; and to operate an effective communications tool that is informative, useful and meets the electronic service needs of SeaComm Federal Credit Union members.

### II. Policy

- A. Using the World Wide Web is strongly encouraged in that it provides SeaComm Federal Credit Union with a powerful tool to convey information quickly and efficiently on a broad range of topics relating to its products, services, activities, objectives and policies.
  
- B. The considerable benefits gained by using the Web must be balanced with risk management procedures against the potential risk to SFCU interests, such as incorrect content.
  
- C. The Marketing department will implement content management best practices with regard to its maintenance administration.
  - All information is either generated by SeaComm Federal Credit Union, or is obtained from sources believed by us to be accurate and reliable as of the date posted on these sites.

- At certain times SeaComm FCU's website may not be available due to system maintenance or circumstances beyond our immediate control. SeaComm FCU conducts frequent and regular backups of member information to protect their information from being erroneously altered due to unintentional errors or equipment malfunctions.

### **III. Disclosures and Notices**

- A. The NCUA and Equal Housing logo will appear on each page.
- B. Promotional content on the website will comply with all advertising disclosure requirements, including Truth in Savings, Regulation Z or other required disclosures.
- C. The complete Privacy Policy is available through a hyperlink displayed on the SeaComm FCU website. (Privacy Policy for the Protection of Nonpublic Personal Information is also available in Adobe .PDF format.) \*SeaComm Federal Credit Union may update this policy. Notification of significant changes in the way we treat personal information will be sent to a member's primary email address specified in their SeaComm FCU profile or by placing a prominent notice on our site.

### **IV. Security Practices**

- A. Access to nonpublic information is restricted to those employees who need to have that information in order to provide products or services to you. We maintain physical and electronic practices and procedures that comply with Federal regulations and leading industry practices to guard current and former member's nonpublic personal information. Our employees are trained about the importance of maintaining confidentiality and member privacy.
- B. We operate secure data networks protected by industry standard firewalls, encryption and password protection. The credit union enforces security procedures to protect confidential information from loss, misuse or alteration.
- C. When visiting our online NetTeller™ site, members will be required to provide multifactor authentication in addition to a Personal Identification Number (PIN) that is their unique password to enter and use our secure online banking service. When using NetTeller™, certain online information, including the transactions conducted, are recorded. This allows SeaComm Federal Credit Union staff to confirm member transactions. The credit union stores no member or account information on our web server, which is accessed by the public. All member account information is housed on computers that are behind firewalls (protected area). All on-line transactions are authenticated and encrypted with the highest level of security protection available.

## **V. Collection and use of consumer information**

- A. Some applications may save a “cookie” on member’s computer hard drive to provide a temporary history of actions taken. When members browse our public website, [www.seacomm.org](http://www.seacomm.org), they do so anonymously. We do not gather user-specific information from their computer internet software or save data about them or their computer.
- B. When members send us personal identifying information via email (that is, in a message containing a question or comment, or by filling out a form that emails us this information), we use it to respond to their request. Information collected via e-mail will be retained at our discretion in a directly readable form for as long as necessary to complete our responses. The e-mail itself may be retained in an archival form.
- C. Information collected via online surveys (voluntary) may be maintained at our discretion for an indefinite period of time. This information would be used to perform various quantitative and qualitative analyses to improve future member service and satisfaction. Our members are under no obligation to participate in such surveys.

## **VI. Web Links**

- A. Hyperlinks to websites of non-affiliated companies:
  - 1) A pop-up alert will notify web visitors they are leaving our site and require them to click “OK” in order to continue.
- B. Hyperlinks to co-branded websites:
  - 1) SeaComm Federal Credit Union may purchase educational content from 3<sup>rd</sup> party vendors that are found to be reliable and relevant to its practices.
  - 2) The pop-up alert is suppressed for co-branding websites, where we have purchased rights to content and integrated it into our website through interactive links.
  - 3) Co-branded websites are reviewed periodically to ensure content is consistent with SFCU goals and philosophy.

## **VII. Children**

- A. SeaComm Federal Credit Union does not knowingly solicit data from children. The law requires parental consent to collect or use information from a child under 13. We recognize that protecting children’s identities and privacy online is important and the responsibility to do so rests with both the online industry and

parents. When anyone (including children) browses our website, they do so anonymously; no information is collected.