



PRIVACY POLICY

TBA Credit Union, your member-owned financial institution, is committed to providing you financial products and services to meet your needs and reach your financial goals. We are equally committed to protecting our members' privacy. You can be confident that your financial privacy is a priority of this credit union. We are required by law to give you this privacy notice to explain how we collect, use, and safeguard your personal information. If you have any questions, please contact a member service representative at 231.946.7090.

Information We Collect and Disclose About You:

We collect nonpublic personal information about you from the following sources:

- Information we receive from you on applications and other forms;
- Information about your transactions with us or others;
- Information we receive from a consumer reporting agency;
- Information obtained when verifying the information you provided 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 all information we collect, as described above, to companies that perform marketing services on our behalf or to other financial institutions with which we have joint marketing agreements. To protect our members' privacy, we only work with companies that agree to maintain strong confidentiality protections and limit the use of information we provide. We do not permit these companies to sell the member information we provide to other third parties.

In order to conduct the business of the credit union, we may also disclose nonpublic personal information about you under other circumstances as permitted or required by law. These disclosures typically include information to process transactions on your behalf, conduct the operations of our credit union, follow your instructions as you authorize, or protect the security of our financial records.

If you terminate your membership with TBA Credit Union, we will not share information we have collected about you, except as permitted or required by law.

How We Protect Your Information:

We restrict access to nonpublic personal information about you to those employees and members of our official family who have a specific business purpose in utilizing your data. Our employees and our official family are trained in the importance of maintaining confidentiality and member privacy. We maintain physical, electronic, and procedural safeguards that comply with federal regulations and leading industry practices to safeguard your nonpublic personal information.

What You Can Do to Help Protect Your Privacy:

TBA Credit Union is committed to protecting the privacy of its members. Members can help by following these simple guidelines:

- Protect your account numbers, card numbers, PINs (personal identification numbers) and passwords. Never keep your PIN with your debit or credit card which can provide free access to your accounts if your card is lost or stolen

- Use caution when disclosing your account numbers, social security numbers, etc. to other persons. If someone calls you, explains the call is on behalf of the credit union and asks for your account number, you should beware. Official credit union staff will have access to your information and will not need to ask for it.
- Keep your information with us current. It is important that we have current information on how to reach us. If we detect potentially fraudulent or unauthorized activity or use of an account, we will attempt to contact you immediately. If your address or phone number changes, please let us know.

BIOMETRIC INFORMATION PRIVACY POLICY AND CONSENT

Scope and Overview

This policy outlines how TBA Credit Union, its vendors, and/or the licensor of the TBA 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 TBA Credit Union, its vendors, and/or the licensor of the TBA Credit Union's consumer verification software collect, capture, or otherwise obtain biometric data relating to a consumer, TBA Credit Union must first:

Inform each consumer that TBA Credit Union, its vendors, and/or the licensor of the TBA Credit Union's consumer verification software are collecting, capturing, or otherwise obtaining the employee's biometric data, and that the TBA Credit Union is providing such biometric data to its vendors and the licensor of the TBA 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 TBA Credit Union, its vendors, and/or TBA Credit Union's consumer verification software to collect, store, and use the consumer's biometric data for the specific purposes disclosed by the TBA Credit Union, and for TBA Credit Union to provide such biometric data to its vendors and the licensor of the TBA Credit Union's consumer verification software.

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

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

Disclosure

TBA Credit Union will not disclose or disseminate any biometric data to anyone other than its vendors and the licensor of the TBA 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

TBA 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 TBA 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

TBA Credit Union shall retain consumer biometric data only until, and shall request that its vendors and the licensor of TBA 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: info@tbacu.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 TBA Credit Union, its vendors, and/or the licensor of the TBA 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 TBA Credit Union's procedures and safeguards for collecting, maintaining, using, disclosing, sharing, storing, and/or destroying this data.

If you have any questions concerning this notice, please do not hesitate to contact us at info@tbacu.com or 231.946.7090. We are here to serve you.