

Our Privacy Notice



Straits Area Federal Credit Union
 201 Locust St./PO Box 367 • Cheboygan, MI 49721
 PH: 231-627-3145 • TF: 800-337-9598
www.mi-safcu.org

**Revised
 June 2023**

FACTS	WHAT DOES STRAITS AREA FEDERAL CREDIT UNION DO WITH YOUR PERSONAL INFORMATION?
Why?	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.
What?	The types of personal information we collect and share depend on the accounts, products or services you have with us. This information can include: <ul style="list-style-type: none"> • Name, address, Social Security Number, and income • Account balances and payment history • Credit history and credit scores
How?	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 Straits Area Federal Credit Union chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Straits Area Federal Credit Union share?	Can you limit this sharing?
For our everyday business purposes —such as to process your transactions, maintain the account(s) you have with us, respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes —to offer our products and services to you	No	We do not share
For joint marketing with other financial companies	No	We do not share
For our affiliates' everyday business purposes —information about your transactions and experiences	No	We do not share
For our affiliates' everyday business purposes —information about your creditworthiness	No	We do not share
For our affiliates to market to you	No	We do not share
For non-affiliates to market to you	Yes	Yes

To limit our sharing	<ul style="list-style-type: none"> • Call 231-627-3145 or toll free at 800-337-9598 or • Visit us online at www.mi-safcu.org. <p>Please note: If you are a new member, we can begin sharing your information thirty (30) days from the date we sent you this notice. When you are no longer our member, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p>
Questions?	Call us at 231-627-3145 or toll free at 800-337-9598, or visit us online at www.mi-safcu.org .

More information about your privacy continued on next page

Who We Are	
Who is providing this notice?	Straits Area Federal Credit Union.

What We Do	
How does Straits Area 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 Straits Area Federal Credit Union collect my personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> • start an account • apply for a loan • use your credit or debit card • pay your bills • make deposits to or withdrawals from the accounts you have with us 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"> • sharing for affiliates' everyday business purposes—information about your creditworthiness • affiliates from using your information to market to you • sharing for non-affiliates to market to you 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 the account you have with us.

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> • <i>Straits Area Federal Credit Union has no affiliates</i>
Non-affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> • <i>Non-affiliates we share with can include mortgages companies and insurance companies</i>
Joint marketing	A formal agreement between non-affiliated financial companies that together market financial products or services to you. Our marketing partners include: <ul style="list-style-type: none"> • <i>Straits Area Federal Credit Union does not jointly market.</i>

Biometric Data Privacy Disclosure



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1. Scope and Overview

This Biometric Data Privacy Disclosure (BDPD) outlines how Straits Area Federal Credit Union, our vendors, and/or the licensor of our member verification software processes biometric data collected from you for identity verification and fraud prevention purposes.

a. Biometric Data Defined

As used in this BDPD, biometric data includes “biometric identifier” 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 BDPD, the photograph you upload to the software for use in the biometric algorithm is considered a “biometric identifier.” “Biometric data” 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.

b. Disclosure and Authorization of the BDPD

To the extent that we, our vendors, and/or the licensor of our member verification software collect, capture or otherwise obtain biometric data relating to a member, we must first:

- Inform each member that we, our vendors, and/or the licensor of our member verification software are collecting, capturing or otherwise obtaining the member’s biometric data, and that we are providing such biometric data to our vendors and the licensor of our member verification software;
- Inform the member of the specific purpose and length of time for which the member’s biometric data is being collected, stored, and used; and
- Receive consent by the member authorizing us, our vendors, and/or our member verification software to collect, store, and use the member’s biometric data for the specific purposes disclosed by us, and for us to provide such biometric data to our vendors and the licensor of our member verification software.

We, our vendors, and/or the licensor of our member verification software will not sell, lease, trade or otherwise profit from members’ biometric data; provided, however, that our vendors and the licensor of our member verification software may be paid for products or services used by us that utilize such biometric data.

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

c. Purpose for the Collection of Biometric Data

We, our vendors, and/or the licensor of our member verification software collect, store, and use biometric data solely for identity verification and fraud prevention purposes.

d. Disclosure

We will not disclose or disseminate any biometric data to anyone other than our vendors and the licensor of our member verification software without/unless:

- First obtaining member consent to such disclosure or dissemination;
- The disclosed data completes a financial transaction requested or authorized by the member;
- 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.

e. Security

We will 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 will be performed in a manner that is the same as or more protective than the manner in which we store, transmit and protect 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.

f. Retention

We will retain member biometric data only until, and will request that our vendors and the licensor of our member 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 member identity;
- Request of member to destroy the biometric data; or
- Within 30 days of member’s provisioning of biometric data.

g. Contact Information

If you have any questions about our use, storage or security of your biometric data you can contact us at:

info@mi-safcu.org.

2. Biometric Information Member Consent

As outlined in the BDPD, you understand and consent to the collection, use, retention, storage, and/or disclosure or re-disclosure of data or images from biometric verification technology by us, our vendors, and/or the licensor of our member verification software. You acknowledge that you have been given a copy of the BDPD, or that the BDPD has been made accessible to you, and you have had an opportunity to review it and request any additional information concerning our procedures and safeguards for collecting, maintaining, using, disclosing, sharing, storing, and/or destroying this data.