



## **Privacy Policy and Information Security Program**

### **Privacy Policy**

**CenCorp recognizes and respects the privacy expectation of members and website visitors; therefore we have adopted the following privacy policy.**

CenCorp will collect, retain and use information only where it believes it would be useful (and allowed by law) to administer business and to provide products, services and other opportunities for member credit unions.

CenCorp agrees not to use nonpublic personal information about a member or its natural person members for any purpose other than those contemplated by an agreement, schedule or contract executed between CenCorp and the member, including servicing and processing of transactions in the ordinary course of business.

CenCorp collects information on Internet service providers of website visitors, as well as, date and time of visits. This information allows us to track website use, measure site traffic and improve site navigation and information.

CenCorp may use feedback information from website users to respond to inquiries, comments or suggestions.

This information is never sold, given or disclosed to third parties.

### **Information Security Program**

CenCorp has developed and implemented an Information Security Program which protects confidentiality of non-public information provided by members; protects against anticipated threats and hazards to the integrity or security of such information; and guards against unauthorized access to or use of such information that could result in substantial harm or inconvenience to the membership of members. As part of its information Security Program, CenCorp uses industry standard data encryption equivalent to 128-bit RC4 encryption protocols.

As part of CenCorp's internal audit function, CenCorp contracts with an independent third party to evaluate and test its internal network security. These audits include both internal and external testing and a review of network security procedures and practices. The

results of these audits are presented to CenCorp's Audit Committee and are used to improve and strengthen network security.

CenCorp believes that it has taken adequate information security steps to protect confidential information internally, and during the transmission of information with authorized external parties.