

FACTS**WHAT DOES Palmetto Trust 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 product or service you have with us. This information can include:

- Social Security number and Account balances
- Credit scores and Payment/Credit history
- Account transactions and Transaction history

When you are *no longer* our customer, we continue to share your information as described in this notice.

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 Palmetto Trust Federal Credit Union chooses to share; and whether you can limit this sharing.

Reasons we can share your information, the reasons we do share your information, and whether you can limit this sharing

For our everyday business purposes— such as to process your transactions, maintain your account(s), 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	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes— information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes— information about your creditworthiness	No	We don't share
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	No	We don't share

Questions?

Call 800 252-0258 or go to www.paltrustcu.coop

TOPIC AREA

Who is providing this notice?

Palmetto Trust Federal Credit Union

TOPIC AREA

How does Palmetto Trust FCU 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 and secured files and buildings.

How does Palmetto Trust FCU collect my personal information?

We collect your personal information, for example, when you

- Open/Update an account or deposit money
- pay your bills or apply for a loan
- use your credit and debit card

We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.

Why can't I limit all sharing?

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

TOPIC AREA

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- *Our affiliates include Palmetto Cooperative Services, LLC, and CUNA Mutual Group which provide business and insurance services.*

Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- *Palmetto Trust Federal Credit Union does not share with nonaffiliates so that they can market to you.*

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- *Our joint marketing partners include financial services and insurance companies.*

TOPIC AREA

What happens when I, as prime member, limit sharing for an account with other joint members?

Answer: Your choices will apply to everyone on your account.

Palmetto Trust Federal Credit Union

PRIVACY POLICY AND AGREEMENT

Trust has always been the foundation of our relationship with members. To preserve your trust, we pledge to protect your privacy by adhering to the practices described below. By signing any application or agreement with us, or your use or continued use of any of our services after receiving this document, you jointly and severally agree to the terms and conditions set forth in this Policy and Agreement. In this Agreement the terms "we," "our," or "us" means Palmetto Trust Federal Credit Union; and the terms "you" or "your" means all members, consumers, borrowers and guarantors.

The Types of Information We Collect. We only collect information about our members for lawful business purposes, or as otherwise required by applicable law. We collect information about members from the following sources: (a) Applications for services, other forms and any communications you send to us including electronic messages from which we collect your name, addresses, phone numbers, social security numbers, financial data, birth date, gender and other information; (b) Transactions involving your accounts or services with us from which we collect information such as your name, account number, balance, payment history, parties to your transactions and credit card usage; (c) Consumer Credit Reports from which we collect information regarding your creditworthiness, credit history and account activity; and (d) Market Research Firms that provide us with a variety of information regarding our members such as the number of individuals in a household, home ownership. You agree that the telephone numbers, street and e-mail addresses provided in your Membership Application and Signature Card, or any other application or communication sent to us are publicly available and will be used to provide notices, disclosures, statements, other communications (including but not limited to our responses to your e-mail communications) and offers for certain products or services.

The Credit Union's Web Site. Use of our web site or linking to a site we sponsor requires the use of "cookies," which are small pieces of information a web site stores on a visitor's web browser to remind the site about the user the next time the site is visited. We do not store confidential or sensitive information through the use of cookies. Our use of cookies enhances our member's online transactions and eases navigation through our web site. For certain application, such as online transactions, cookies are required to help protect the privacy of a member's transactions by, for example, terminating the session if the member forgets to log out. We collect e-mail addresses from members who request electronic services, and from users of our web site who choose to provide their addresses.

The Types of Information We Disclose. To benefit our members, we share the information described in Paragraph 1, above within the Credit Union, and with certain trusted third parties described in this paragraph, who are obligated to maintain the confidentiality and security of your private information. We use the services of various third parties to assist us in offering financial services to our members. For example, we use the services of third parties for processing transactions using credit cards, checks, debit cards and other access devices; for assistance in making loans, loan underwriting; processing loan applications; appraising collateral and for processing our outgoing mail. We also work with companies that provide financial planning, investment services, extended automotive service contracts, personal and property insurance, credit counseling, retail automobile sales and travel services to members.

We share information with Palmetto Cooperative Services, LLC ("PCS"), a credit union service organization. This company is owned by us and other Credit Unions through ownership of the South Carolina Credit Union League. PCS provides the following types of services to us: item processing and collection, statement printing, mailing services, bookkeeping and accounting, consulting and business development. We share information about individual members with CUNA Mutual Group ("CMG"), which is a diversified financial services company that serves Credit Unions and their Members. CMG uses this information to offer insurance and/or mortgage lending services to our members.

We may also share information when permitted or required by applicable law.

Security. We are committed to taking every reasonable precaution to protect individual identifying information that you provide to us. We restrict access to nonpublic personal information about you to employees who need to know that information to provide products or services to you. We also maintain physical, electronic and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.

Notices and "Joint Relationships," Except where expressly required by applicable law, we will provide all notices to the person (member) listed first on any application, agreement or other relevant document with us. The notice will be mailed to the address noted for said person on the application, agreement or other document. If this person (member) has agreed to receive notices and disclosures electronically, then we can send all such notices and notifications, to the e-mail or Internet address provided by said person. All joint owners, borrowers and guarantors agree to the receipt and sufficiency of any notice or notification sent according to this paragraph.

What members can do to help. Protect your account numbers, card numbers, PINs (personal identification numbers), and passwords. In particular, never keep your PIN with your debit card or credit card, as that makes you vulnerable in the event your card is lost or stolen. Use caution in revealing account numbers, social security numbers, etc. to other persons. In particular, if a caller tells you he/she is calling you on behalf of the credit union and asks for your account number, you should

beware. Legitimate credit union staff would already have access to that information. It's important that the credit union has current information about how to reach you. If we detect potentially fraudulent use of your account, we will attempt to contact you immediately. If your phone number or address changes please let us know so that we can contact you.

Beware of Phishing Scams. "Phishing" scams often come as an official looking e-mail that appears to come from your Credit Union, bank, government regulator, credit card company, PayPal, etc. The e-mail usually says that there is something wrong with your account or that they need to verify your information. These messages have been forged and are fraudulent. We will not contact you by e-mail to verify your information or inform you that you have a problem with your account. You should just delete these messages, never reply to them or follow their instructions.

Protecting Children. We do not knowingly solicit or collect data from children and we do not knowingly market to children online. We recognize that protecting children's identities and online privacy is important and that responsibility rests with us and with parents.

Modification. The Credit Union reserves the right to modify, change or amend this Privacy Policy and Agreement at any time without notice other than as expressly required by applicable law.

Adopted November 2000, last revision January 2011