

## **WESTERN DIVISION FEDERAL CREDIT UNION**

6750 MAIN STREET  
WILLIAMSVILLE NY 14221-5947  
(716) 632-9328

## **WEBSITE PRIVACY POLICY**

Western Division Federal Credit Union respects the personal and financial privacy of all of its members. We are committed to protecting the information on and within our web site with the same safety and confidentiality standards utilized in the transaction of all member business. The following information will help you to understand how we protect the information gathered.

Western Division may collect Personal Information such as:

- user name
- e-mail addresses
- Internet Service Provider address
- access time and date
- failed login attempts

Western Division may collect Non-Personal Information such as (through Google's Universal Analytics):

- date and time of your visit to our website
- pages and documents that you viewed
- URL of the website you visited before ours
- domain name of which you are accessing our website
- type of version of your web browser and operating system

We collect this information for internal reporting of web site statistics, and product monitoring to improve our services. Information obtained from our web site is kept secure, and access to that information is limited with the credit union personnel who need to know the information to provide products or services to our members and to properly operate the credit union. We may gather information that is not personally identifiable to you so that we can evaluate the usefulness of our web site. This may include the number of hits, pages visited and the length of user sessions.

### **E-MAIL**

Western Division asks that you do not send confidential information to us via e-mail. E-mail is not necessarily safe against interception. NEVER will the credit union solicit you for passwords, PINs or other confidential information. If your communication is sensitive, or includes personal information such as account numbers, credit card numbers, personal identification numbers, social security numbers, or date of birth, you should phone or use regular mail. Western Division will, likewise, not transmit sensitive or personal information that can compromise or violate a user's privacy when communicating via e-mail.

### **ONLINE BANKING CONFIDENTIALITY AND SECURITY**

ItsMe247 (Online Banking) is provided by a separate entity, CUAnswers. This provider only receives information as permitted by law and is subject to contractual confidentiality provisions restricting any release and use of nonpublic personal information. When you conduct an online transaction or use a service through Online Banking, such as obtaining account information, transferring funds between accounts, paying a bill or completing an application, we request information from you online at our Online Banking site. This information is needed so that we can follow your instructions or review your request or application or so that you can perform a transaction. In these cases, we only collect the information necessary to interact with you and to respond to your requests or instructions.

Online Banking account requires the member to use a login name that is not the member number account, to protect account information. Additionally, a complex password is required, and we use 2 factor authentication, whereas user is presented with a challenge question and response. When using Online Banking we provide a number of additional security features at Western Division. After logging in, your online "session" will "timeout" after 5 minutes of inactivity and you will be automatically logged off. This prevents other individuals from accessing your personal information in case you have left your device unattended without logging out. When you submit your password, it is compared with the password we have stored in our secure database. We allow you to enter your password incorrectly three times. If you enter your password incorrectly more than three times, your access to Online Banking will be locked until you call us to reactivate the account. We monitor and record "bad login" attempts to detect any suspicious activity, such as someone trying to guess your password.

Your Western Division information is password-protected and uses 2 factor authentication. We use industry-standard SSL encryption to protect data transmissions. When logging into any Online Banking Service, you will receive a pop-up window or agreement. By accepting this agreement you are accepting the policies and procedures of that service and it's provider.

### **ONLINE FORMS & SERVICES**

Western Division uses a secure socket layer (SSL) encryption to protect the transmission of information you submit to us when you use our secure online forms. When you communicate with us, we collect only the personal information that is necessary to conduct our business.

### **INTERNET ACCESS FEES AND TELEPHONE CHARGES**

You agree to be solely responsible for any telephone charges, internet access fees, and other such similar fees and expenses you incur by accessing Western Division through this site. Please note that these fees may be assessed and billed separately by your online service provider or phone company.

### **CHANGES TO PRIVACY POLICY**

Western Division may update this policy. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address specified on your account or by placing a prominent notice on our site or message through Online Banking.

### **CHILDREN**

Western Division does not knowingly solicit data from children. We recognize that protecting children's identities and privacy on-line is important and the responsibility to do so rests with both the online industry and parents.

### **COOKIES**

Cookies are a feature of web browser software that allows web servers to recognize the computer used to access a website. They are small bits of data that are stored by a user's web browser on the user's hard drive. Western Division uses internet cookies for the sole purpose of getting analytics information to provide relevant services to customers.

### **LINKS**

Western Division's site contains links to other sites outside of our website. This privacy statement does not apply to those other sites. We provide these links for education purposes or that may be of interest to our members. We will advise when clicking on these links that it will take you outside of the Western Division website. Western Division does not control and is not responsible for the content, availability, privacy or security policies practiced by these third-party websites.

## **INTERRUPTION OF SERVICE**

At certain times, Western Division's website may not be available due to system maintenance or circumstances beyond our control. Western Division (via our provider CUAnswers) conducts frequent and regular backups of your information and utilizes redundant information practices to protect your information from being erroneously altered due to unintentional errors and equipment malfunctions.

## **EMPLOYEE SECURITY STANDARDS**

Western Division maintains information standards and procedures that include physical and electronic safeguards, restricting access to those with a need-to-know position and training employees on the importance of information security.

## **ACCESSIBILITY POLICY**

It is the policy of Western Division that information and services on this site were designed to be accessible to people with disabilities in compliance with the Americans with Disabilities Act (ADA).

## **SECURITY**

This site is maintained by Western Division Federal Credit Union in conjunction with our provider CUAnswers. Unauthorized attempts to upload information and/or change information on this site is strictly prohibited and will result in reporting the offense to the authorities for prosecution. For security purposes, we use software programs to monitor traffic to identify unauthorized attempts to cause damage.

## **ENFORCEMENT**

Western Division has staff who monitor and ensure the terms of this policy. Questions regarding this policy should be directed to [memberservice@westerndivision.org](mailto:memberservice@westerndivision.org) and will be forwarded to our Compliance Officer. You may also reach us at (716) 632-9328.