

# Privacy Frequently Asked Questions

## Consumer Insurance Solutions

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Protecting member privacy is a priority for TruStage™ Consumer Insurance Solutions. Our physical, electronic, and procedural safeguards combine to protect nonpublic personal information in accordance with applicable federal and state laws and regulations. Through cooperative efforts between credit unions and Consumer Insurance Solutions, credit unions can protect their members' privacy and maintain compliance with all applicable laws and regulations.

### Frequently asked questions

| Question   | Response   |
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| Under Consumer Insurance Solutions, is it permissible for credit unions to share membership information with TruStage? | Yes, if the credit union follows any state specific requirements and the requirements set forth by the Consumer Financial Protection Bureau in 12 CFR part 1016, "Privacy of Consumer Financial Information (Regulation P)". This Regulation allows sharing of nonpublic personal information to nonaffiliated third parties if (1) the credit union provides their members with a privacy notice that contains all required disclosures; and (2) there is a contractual agreement between the parties that prohibits disclosing or using the information other than to carry out the purpose for which the information is disclosed.                            |
| Do credit unions have to offer an 'opt out' to members at the time they send out their privacy notice?                 | <p>If the credit union provides the appropriate privacy notice and meets the contractual obligations under Regulation P, generally, an opt-out of sharing for joint marketing is not required. However, some state requirements vary and may require an opt-out to allow this type of sharing. <b>Credit unions should check with their legal counsel to determine if there are any state variations that may require an opt-out.</b></p> <p>Consumer Insurance Solutions requires a Joint Marketing Agreement between the credit union and TruStage that includes a provision that requires the parties to protect members' nonpublic personal information.</p> |

| Question  | Response   |
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| Are credit unions an affiliate of TruStage?   | No. The insurance companies of TruStage are separate entities that may engage in joint marketing with credit unions. TruStage is the marketing name for TruStage Financial Group, Inc., its subsidiaries, and affiliates.  |
| Does the Gramm-Leach-Bliley Act (GLBA) prohibit financial institutions from sharing information such as Social Security numbers and date of birth with nonaffiliated third parties? | <p>In general, if credit unions notify members in their privacy notices that they share nonpublic personal information, credit unions can share this information under GLBA requirements. Nonpublic personal information is broad and includes any personal information the credit union obtains through the course of doing business with the member. For most member information sharing activities, it typically includes the person's name, address, Social Security number, birth date and telephone number. Also included is member relationship information in a credit union such as effective dates, termination dates, product codes (Share Savings, Share Draft, etc.) All this information, and especially restricted and sensitive information, must only be shared if necessary and with proper protections.</p> <p>Keep in mind apart from GLBA, information sharing requirements do vary at the state level. There may be state laws in place that prohibit sharing certain types of data.</p> |
| What assistance will TruStage provide to credit unions with their privacy notice obligations?   | <p>TruStage Compliance Solutions can assist your credit union in creating a tailored Privacy Disclosure that may be provided with other disclosures during the membership / account opening process. The disclosure may also be used to fulfill annual notice requirements by inserting it with quarterly or monthly statements for ease of distribution to members. You may initiate an order for the Compliance Solutions Privacy Disclosure by completing and submitting the Privacy Disclosure Order Request and Questionnaire. You may obtain the Order Request and Questionnaire by calling 800.356.5012 (option #1) or by visiting <a href="https://trustage.com/business-solutions/compliance-solutions">trustage.com/business-solutions/compliance-solutions</a>. (Click Compliance Solutions Log in, click Resource center login, go to Document resources, click Search document samples, search Privacy, click Order under the desired Privacy Disclosure Document and complete the form.)</p>     |

**Insurance | Financial Services**

# TruStage™ Auto & Home Insurance Due Diligence

## Consumer Insurance Solutions

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The Consumer Insurance Solutions Auto & Home Insurance Partner Management Team conducts regular reviews with our strategic partners and their technology security practices.

- TruStage™ takes security related to external strategic partnerships seriously. To that end, audits with strategic partners take place on a regular basis and include SSAE 18 reporting, compliance with Gramm-Leach-Bliley Act (GLB), and statements of security and privacy practices. These reviews take place as part of the selection process, before ever doing business with a strategic partner, and then on a regular basis, annually if appropriate.
  - Data security:
    - Our partners have computer security procedures in place to protect all personal information of their policyholders.
    - Our partners ensure physical security measures are in place to control physical access to systems or outputs that contain personal data and privileged information.
    - Only necessary information is gathered and stored for only as long as it is needed; when it is no longer needed it is properly disposed of in a safe and secure manner.
  - Data privacy:
    - Our partners have privacy practices and controls in place that are in full compliance with state insurance codes and all applicable regulatory requirements.
    - Our partners are limited in the data they share back with TruStage. For example, we only receive data that is necessary to maintain business processes.