

## **Enterprise First Financial Services (“EFFS”) Privacy Commitment**

Enterprise First Financial Services, is a wholly owned credit union service organization of Ent Federal Credit Union, and operates EFFS Insurance Services, a licensed insurance agency that is committed to protecting the privacy of its clients and customers. References to “we”, “us”, and “our” refer to EFFS Insurance Services. References to “you” and “your” shall mean the clients and customers of EFFS Insurance Services. In the course of providing services to you, we collect information about you. Some of this information is nonpublic personal information. We do not sell your nonpublic personal information but we share some of the nonpublic personal information with our service providers in order to serve you better. We share your nonpublic personal information only with contractual safeguards to protect the confidentiality of the information. The purpose of this notice is to inform you of our Privacy Policy. If you have any questions after reading this policy, please contact one of our representatives at (719) 574-1100 ext. 6100 or 800-525-9623 ext. 6100.

### **Information We Collect About You and Disclose to Others**

We collect information about you from the following sources:

- information we receive from you on applications and other forms (for example, name, address, Social Security Number, assets and income);
- information about your transactions with us, our affiliates or others including those companies that work closely with us to provide you with diverse financial products and services (for example, your account balance, payment history, parties to transactions);
- information we receive from a credit reporting agency (for example, your credit-worthiness and credit history);
- information obtained when verifying the information you provide on an application or other forms (this may be obtained from your current or past employers, or from other institutions where you conduct financial transactions); and
- information we may obtain from consumer purchasing and census data providers to develop competitive marketing programs for our members.

We do not disclose nonpublic personal information about our members and former members to anyone, except as permitted by law. If you decide to terminate your relationship with us, we will not share information we have collected about you, except as required or permitted by law.

### **Parties Who Receive Information from Us**

We share your nonpublic personal information with our affiliates who offer investment and financial services. In addition, we may disclose nonpublic personal information about you to the following types of third parties:

- financial service providers such as those that provide securities, insurance, trust and mortgage services; and
- non-financial companies, such as consumer reporting agencies.

So that we may provide our clients and customers competitive products and services, we may disclose all of the information we collect, as described above, to companies that perform marketing or other services on our behalf and to other service providers with whom we have joint marketing agreements. We may also disclose information about you to third parties under circumstances as permitted or required by law. These disclosures typically include information to process transactions on your behalf, conduct our operations, follow your instructions as you authorize, or protect the security of our financial, client or customer records. We do not permit these companies to sell the information we provide to other third parties.

### **Fair Credit Reporting Act Disclosure**

In this notice we are also required to advise you of our disclosure policy under the Fair Credit Reporting Act. The Fair Credit Reporting Act governs the sharing of information that may have an impact on you for certain purposes such as credit, collections and insurance. We learn information about you from our experience with you and from information provided to us by others, such as credit reports. The Fair Credit Reporting Act permits us and we do share information from our experience with you with others, including affiliates and credit reporting agencies. The Fair Credit Reporting Act permits us to share information we learn from others unless you direct us otherwise. If we elect to share information about you that we learn from others for a purpose under the Fair Credit Reporting Act, we will give you a notice of our intention to do so and the right to direct us not to share the information.

### **How We Protect Your Information**

We provide access to information about you only to those employees who need the information to provide you with products and services. We maintain physical, electronic and procedural safeguards that comply with federal regulations to guard your information.

**Opt-Out Notification**

Ent Federal Credit Union and its affiliates like EFFE Insurance Services are providing the following notice. You may limit financial services, brokerage, insurance, and trust marketing of their products based on your personal information received from the credit union and other affiliates. This information includes your income, account history and your credit score. Your choice to limit marketing offers which are created in this manner will be in effect until you tell us differently for a period up to five years. Prior to the five year expiration, you will be notified that you may continue your opt-out selection for a period of five more years.

**To limit marketing offers created with personal information, from the credit union or another affiliate, contact us:**

- By phone: (719) 574-1100 ext. 6100 or 800-525-9623 ext. 6100
- By email: [Service@Ent.com](mailto:Service@Ent.com)
- By mail: EFFE Insurance Services  
P.O. Box 15819  
Colorado Springs, CO 80935-5819

**And include the following statement:**

Do not allow the credit union or other affiliates to use personal information from another affiliate to market products and services to me.

**Mailing Address:**

Ent Federal Credit Union  
P.O. Box 15819  
Colorado Springs, CO 80935-5819

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