

WINDSOR LOCKS FEDERAL CREDIT UNION WEBSITE PRIVACY POLICY

Windsor Locks Federal Credit Union (WLFCU) 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 WLFCU business. The following information will help you to understand how we protect the information gathered.

WLFCU may collect information such as:

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

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

WLFCU asks that you do not send confidential information to us via e-mail. E-mail is not necessarily safe against interception. WLFCU will NEVER 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 telephone us or use regular mail. WLFCU will, likewise, not transmit sensitive or personal information that can compromise or violate a user's privacy when communicating via e-mail.

INTERRUPTION OF SERVICE

At certain times, WLFCU's website may not be available due to system maintenance or circumstances beyond our control. WLFCU 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.

SPECIFIC INFORMATION WE MAY COLLECT WHEN USING WLFCU INTERNET HOME BANKING

When you conduct an online transaction through Internet Home Banking, such as obtaining account information, transferring funds between accounts, paying a bill or completing an application, we request information for you online at our Internet Home Banking site. This information is needed so that you can follow your instructions or review your request or application or so 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. We may keep track of the number of times you log on per month to Internet Home Banking. We do not gather or sell this information to any third parties.

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 WLFCU through this site. Please note that these fees may be assessed and billed separately by your internet service or telephone provider. Your WLFCU Internet Home Banking account is free of charge.

CHANGES TO THIS POLICY

WLFCU may update this policy. We will notify you about significant changes in the way we treat personal information by sending you a notice or by placing a prominent notice on our website.

CHILDREN

WLFCU 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

WLFCU does not utilize internet "cookies" with the exception of Internet Home Banking. 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. Cookies can remember what information a user accesses on one web page to simplify subsequent interactions with that website by the same user or to use the information to streamline the user's transactions on related web pages. Cookies should make your online experience easier and more personalized. Some of our associated companies may themselves use cookies on their own websites. We have no access to, or control of these cookies, should this occur.

LINKS

We are not responsible for practices employed by websites linked to or from our site, nor the information, content, accuracy, or opinions expressed in such websites, and such websites are not investigated, monitored or checked for accuracy or completeness by us, nor do we maintain any editorial or other control over such websites. Inclusion of any linked website on our site does not imply approval or endorsement of the linked website by us. This remains true even where the linked site appears within the parameters or window/frame of our site. Often, links to other websites are provided solely as pointers to information on topics that may be useful to users of our site. Please remember that when you use a link to go from our site to another website, our Privacy Policy is no longer in effect. Your browsing and interaction on any other website, including websites which have a link to our site, is subject to that website's own rules and policies.

Whenever you click on a link that goes to another site, WLFCU will provide a disclaimer that states: "You are leaving the Windsor Locks Federal Credit Union website. The website you are linking to is not operated by Windsor Locks Federal Credit Union. We are not responsible for any content or information posted to this external web site. Windsor Locks Federal Credit Union is not responsible for, nor do we represent you or the External web site if you enter into any agreements."

We are not responsible for the data collection and practices of third parties linked to our website. Please read the rules and policies of the third-party sites before proceeding. If you decide to leave our site and access these third-party sites, you do so solely at your own risk.

CONFIDENTIALITY AND SECURITY

We provide a number of additional security features at WLFCU. After logging into Internet Home Banking, your online session will "timeout" after 5 minutes of inactivity. This prevents other individuals from accessing your personal information in case you have left your PC unattended without logging out. When you submit your password and security information (image and challenge questions), they are compared with the data we have stored in our secure database. We allow you to enter this information incorrectly three times. If you enter your password or security information incorrectly more than three times, your access to WLFCU's Internet Home 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.

UNAUTHORIZED ACCESS OR USE

Unauthorized access or use of the Windsor Locks Federal Credit Union's web site is not permitted and may constitute a crime punishable by law.

EMPLOYEE CONFIDENTIALITY

The Credit Union limits access to sensitive information to specific employees to ensure confidentiality of member account information.