

Privacy

As appropriate, this policy and its protections and standards also apply to non-members dealing with the credit union, in such cases the term Owner refers to non-members equally. For the purposes of this policy NCS refers to Nexus Community Savings, a Division of Alterna Savings and Credit Union Limited.

1. Privacy Officer

At NCS, the Privacy Officer is appointed by the Board of Directors. The Privacy Officer is responsible for ensuring compliance with this policy and such legislation (see also #10 below).

2. Identifying Purposes

Personal information provided by members/owners or through authorized verification or collection will only be used for the following purposes as identified in NCS Service Agreement with members/owners (as described below) and/or as may be specifically identified at the time the information is requested of the member/owner:

- To confirm the identity of the member/owner
- To determine the member's/owner's qualifications and eligibility for selected services (such as, but not limited to, registered savings products or loans)
- To fulfill legal reporting requirements (such as, but not limited to, payment of interest and/or dividends)
- To protect both the member/owner and NCS from losses due to error or fraud, and
- To provide high quality, proactive service through a better understanding by NCS and its staff and agents of the owner's financial status, goals, needs and wants.

3. Consent

NCS obtains the consent of new members/owners (to collect, store, use and exchange or disclose personal information for the above stated purposes) at the time the member/owner first joins the credit union (through acknowledgement and acceptance of the Service Agreement) and from existing members/owners with the publication, distribution and acceptance of new versions of the Service Agreement as they may be issued from time to time. This policy is specifically referenced in the Service Agreement.

4. Collection of Information

NCS collects only that personal information necessary (to achieve the purposes set out above) from and about members/owners using only open, fair and lawful means.

5. Use, Disclosure and Retention of Information

NCS only uses the member's/owner's personal information for the above stated purposes unless, if for another separate purpose, separate explicit consent is obtained from the member/owner or unless required or allowed by law. If member/owner personal information is disclosed or exchanged with another party (such as a financial product or service provider), NCS will ensure that such party accepts and will comply with the provisions of this policy. NCS will retain the member's/owner's personal information as long as necessary to achieve the stated purposes and to comply with legislation and regulations regarding records retention. When information is no longer required to be kept, NCS will destroy paper files and purge electronic files in a secure way that will eliminate the possibility of information contained in such files ever being accessible to anyone else.

6. Accuracy

NCS will undertake its best efforts to maintain the accuracy and currency of all member/owner personal information contained in its files and will update such information promptly when advised by the member/owner of a change or when NCS otherwise learns of a change.

7. Safeguards

NCS will store all members'/owners' personal information in files (both paper and electronic) to which only authorized personnel have access (such as in vaults behind doors with combination locks and in computer files protected by passwords). All NCS staff sign a Code of Ethics and Conduct on gaining employment and annually thereafter in which they acknowledge their duties subject to this policy and subject to related legislation. Members of the Board of Directors view NCS reports which may contain individual owner names or other specific information with respect to individuals. All Directors acknowledge their duties and responsibilities with respect to confidentiality of member/owner information and all sign a Code of Ethics annually while in office.

8. Openness

This policy is accessible via NCS's Internet website and paper copies are available on request to any NCS office. On further request to the Privacy Officer, NCS will outline and explain in more detail its specific practices, procedures and safeguards for owner personal information

9. Individual Access

During regular business hours and at their home branch, any member/owner may view the paper and electronic files maintained by NCS with the member's/owner's personal information. The member/owner may review the information contained in such files and comment on its accuracy, identify items of information not correct or not current and make specific suggestion or request for their proper revision.

10. Compliance

NCS members/owners may contact the Privacy Officer with questions, suggestions or opinions with regard to NCS's compliance with this policy and relevant legislation. **The Privacy Officer may be contacted at:**

**Nexus Community Savings
P.O. Box 35
84 London Road
Thamesville, Ontario.
NOP 2K0.
Attn: Privacy Officer**

or Tel: 519-692-3855 x 4011

The Privacy Officer is responsible for monitoring applicable legislation and taking such steps as required to ensure that NCS and this policy and its related practices, procedures and safeguards remain in compliance. This responsibility will include suggesting draft revisions of this policy for Board of Directors consideration and adoption at the appropriate times.