COVANTAGE CREDIT UNION
PRIVACY POLICY

PURPOSE
CoVantage recognizes its responsibility to protect the privacy of our members' nonpublic personal information. We are committed to providing financial products and services that enable our members to meet their financial needs and goals while at the same time protecting the members' nonpublic personal information.

Laws governing the treatment of consumer's nonpublic personal information serve to protect consumers from unlimited disclosure of personal financial information. CoVantage will comply with all applicable laws and regulations governing the privacy of nonpublic personal information to protect consumers from unlimited disclosure of personal financial information.

We may disclose, under certain conditions, nonpublic personal information about members to affiliates and, on a limited basis, to nonaffiliated third parties only as necessary to complete transactions authorized or requested by a member, as required or permitted by law, or pursuant to a formal joint marketing agreement. CoVantage does not share member information with nonaffiliated third parties for marketing purposes, except through our joint marketing arrangement with TruStage.

RESPONSIBILITY
The Board of Directors is ultimately responsible for the credit union's adherence to all applicable laws and regulations governing collection, use or disclosure of nonpublic personal information obtained from consumer members in the ordinary course of business. For effective administration of this Policy, the Board designates the President to direct the activities required to implement and maintain compliance with this Policy. The President delegates daily responsibilities and oversight to the Compliance Officer.

The Board will review this Policy whenever a change in law or regulation requires a policy review or at least annually.

DEFINITIONS AND REFERENCES
For the purpose of this Privacy Policy the following definitions shall apply.

<u>Affiliate</u> means any company that controls, is controlled by, or is under common control with another company. They can be financial or nonfinancial companies.

<u>Non-affiliate</u> means any company not related by common ownership or control. They can be financial and non-financial companies.

<u>Consumer</u> means an individual who obtains or has obtained a financial product or service from CoVantage that is to be used primarily for personal, family, or household purposes, or that individual's legal representative.

<u>Joint Marketing</u> means a formal agreement between non-affiliated financial companies that together market financial products or services to consumers.

<u>Nonpublic personal information</u> means personally identifiable financial information; and any list, description, or other grouping of consumers (and publicly available information pertaining to them) that is derived using any personally identifiable financial information that is not publicly available.

<u>Personally identifiable financial information</u> means any information a consumer provides to the Credit Union to obtain a financial product or service or as a result from any transaction.

References:

- Gramm-Leach-Bliley Act of 1999, 15 U.S.C. 6801 et seq.
- Consumer Financial Protection Bureau (CFPB) Privacy of Consumer Financial Information, Regulation P, 12 CFR 1016

GUIDELINES

To ensure members can rely on the quality of products and services we make available and be assured of the strictest confidentiality of the nonpublic personal information we obtain, CoVantage stands behind the following privacy guidelines:

- As a normal course of business, we may disclose non-public personal information to certain financial institutions to facilitate marketing of our own products or services; or marketing of financial products or services offered pursuant to a joint marketing agreement between these financial institutions and CoVantage. Currently, the only financial institution we have a joint marketing agreement with is TruStage (formerly CUNA Mutual Group).
- We will disclose non-public personal information to any financial institution provided the information is needed to complete a transaction or when a member has requested or authorized; example of such disclosures would be loan payoff amounts to car dealers or real estate offices. We will disclose non-public personal information to a non-affiliated party when the information is required, or is a usual, appropriate, or an acceptable method to carry out the transaction.
- CoVantage does not share nonpublic personal information with nonaffiliated third parties for their marketing purposes. Any sharing with nonaffiliated third parties is limited to: (1) disclosures necessary to complete a transaction requested or authorized by the member; (2) disclosures required or permitted by applicable law or regulation; and (3) joint marketing with TruStage as described above. We partner only with businesses that follow strict confidentiality requirements.
- Members may limit certain sharing of their nonpublic personal information. Specifically, members may opt out of: (1) joint marketing between CoVantage and nonaffiliated financial companies (currently, TruStage); and (2) use of member information by our affiliate, CuVanta Title Services, for marketing purposes. To opt out of one or both of these, members may call us at **1-800-398-2667.** Members may also notify us in writing by mailing a request to **CoVantage Credit Union, PO Box 107, Antigo, WI 54409**, emailing **optout@covantagecu.org,** visiting us online at **www.covantagecu.org** or by signing CoVantage's "What does CoVantage Credit Union do with your personal information?" (See Appendix "A").
- The right to opt out does not apply if our disclosure of nonpublic personal information is necessary to effect, administer or endorse a transaction that a consumer requests or authorizes.

CONFIDENTIALITY AND SECURITY SAFEGUARDS

CoVantage will protect the personal information of its members. We will maintain strong security controls to ensure that member information is protected. We have controls in place that limit employee access to confidential member financial information to those employees with a business reason for knowing such information. Additionally, we maintain physical, electronic, and procedural safeguards that comply with federal regulations.

DISCLOSURES
CoVantage will disclose its privacy policies as required by law.

An initial privacy notice will be provided to consumer members at the time a member relationship is established. If there is a change in the model privacy form or we change our privacy practices, a revised privacy notice will be provided to members in a conspicuous form they may keep.

TRAINING
Employees will receive annual training that emphasizes the confidentiality and integrity of nonpublic personal information, and duties of employees to protect such information. Employees whose responsibilities include account opening, consumer loans, or other consumer products and services will receive specialized training on the Credit Union's privacy practices to members and the proper delivery of initial privacy notices.

This policy shall be reviewed annually by the Board of Directors and amended as circumstances warrant.

Approved by the Board of Directors on ______________.

________________________________ ________________________________
Chair Secretary

APPENDIX A

Rev. 5/2026

FACTS	WHAT DOES COVANTAGE CREDIT UNION DO WITH YOUR PERSONAL INFORMATION?
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: • Social Security number and account balances • Transaction and payment history • Credit history and credit scores
How?	All financial companies need to share member's personal information to run their everyday business. In the section below, we list the reasons financial companies can share member's personal information; the reasons CoVantage Credit Union chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does CoVantage Credit Union share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	Yes
For our affiliates' everyday business purposes— information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes— information about your creditworthiness	No	We Don't Share
For our affiliates to market to you	Yes	Yes

To limit our sharing	• Call toll-free 800-398-2667 or • Email us at optout@covantagecu.org or • Mail the form below **Please note:** If you are a *new* member, we can begin sharing your information 30 days from the date we sent this notice. When you are *no longer* our member, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.
Questions?	• Call toll-free 800-398-2667 or go to www.covantagecu.org

Mail-in Form

	Mark to limit: ❑ Do not share my personal information with other financial institutions to jointly market to me. ❑ Do not allow your affiliates to use my personal information to market to me.
	Name:
	Address:
	City, State, Zip:
	List all account(s):
Mail To:	CoVantage Credit Union PO Box 107, 723 6th Ave Antigo, WI 54409-0107

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Who we are	
Who is providing this notice?	CoVantage Credit Union
What we do	
How does CoVantage Credit Union protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does CoVantage Credit Union collect my personal information?	We collect your personal information, for example, when you • Open an account or deposit money • Apply for a loan or use your credit or debit card • Provide account information We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.
Why can't I limit all sharing?	Federal law gives you the right to limit only • sharing for affiliates' everyday business purposes—information about your creditworthiness • affiliates from using your information to market to you • sharing for nonaffiliates to market to you
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. • *CuVanta Title Services*
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. • *CoVantage Credit Union does not share with nonaffiliates so they can market to you.*
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. • *Our joint marketing partner is TruStage.*