Lexington Avenue Federal Credit Union
Web Site Privacy and Compliance Policy

Privacy

The directors, management, and staff of Lexington Avenue Federal Credit Union take the privacy of our members’ personal financial information very seriously. We understand that our members furnish sensitive information to the Credit Union in the course of daily business, and the Credit Union is committed to treating such information responsibly. We know that our members expect privacy and security for their personal and financial affairs. As a result, we have developed the following website privacy policy.

• Use of Personal Information:
  Certain sections of this web site may ask our members to provide personal information. The Credit Union will use this information solely for the purpose of carrying out our normal course of business and to provide members with the products and services that they request. We maintain physical, electronic and procedural safeguards that comply with Federal regulations to guard members’ nonpublic personal information.

• Cookies:
  We gather and analyze data regarding usage of our web site by means of “cookies”. These cookies do not collect personally identifiable information and we do not combine information collected through cookies to determine the identity of our members or their e-mail address. We use cookies to determine if they have previously visited our web site as a way of measuring the usefulness of our site.

• Third Parties:
  We do not and will not sell or provide any member information to list services, telemarketing firms, or outside companies for independent use. The Credit Union does disclose information we collect, as permitted by law, to Credit Union service providers with whom we have joint marketing agreements, other affiliates to help us administer our business or provide product information to members, and other third parties, but only to administer products and services obtained from the Credit Union, to conduct our business, or when legally required.

• Protecting Your Personal Information:
  Access to the Credit Union through its online products and services is protected by the use of Secure Socket Layer (SSL) encryption. This technology “scrambles” members’ personal information so that it is only recognizable to the Credit Union and the user’s computer. We use a multi-factor authentication process and require a password for members to access their accounts online. Members can help maintain the security of their personal information by not sharing passwords with anyone and by changing passwords on a regular basis.

• E-mail Messages:
  We preserve members’ e-mail addresses and the contents of e-mails so that we may respond to those e-mails, follow-up on any questions and use suggestions to improve our services. Note, however, that the e-mail messages sent to us may not be secure against interception by unauthorized individuals outside of the Credit Union. Therefore, if it is necessary to
communicate sensitive or personal information with the Credit Union, it may be done by telephone, postal mail or by personally visiting one of our representatives.

- Other Links From this Web Site:
The Credit Union makes a sincere effort to ensure that all other sites linked to this web site follow a privacy policy similar to ours. We notify members whenever they follow a link to a site that is not affiliated with the Credit Union. We cannot, however, be responsible for any information that may be collected at unaffiliated sites.

If members have any comments or questions regarding Lexington Avenue Federal Credit Union’s Website Privacy and Compliance Policy, they may contact a representative at 1-585-254-4543.

**Compliance**

It is necessary for the Credit Union’s web site to be in compliance with all applicable State and Federal laws as well as NCUA Rules and Regulations. As a part of its ongoing compliance, the Credit Union will ensure the following:

- The web site will be updated to reflect applicable changes in policies and procedures.
- Online advertisements will be reviewed for rate accuracy and proper disclosure requirements.
- The rates page will be reviewed on an ongoing basis and will be immediately updated when rates change.
- The fee schedule page will be reviewed on an ongoing basis and will be immediately updated when fees change.
- On a quarterly basis, the Credit Union will review all linked pages.
- On a quarterly basis, the Credit Union will check for its name on other web sites to ensure the reference is appropriate.
- On an annual basis, the Credit Union will have the web site reviewed by an independent party to ensure compliance.
- The Credit Union will comply with all record retention requirements, including but not limited to those related to online applications and rate and fee disclosures.

Reviewed and re-approved by the Board of Directors of Lexington Avenue Federal Credit Union on November 1, 2012.