

Evansville Firefighters FCU Web Site Policy

Approved: 02/05/2014

General Policy Statement:

The Credit Union maintains a Web site that is hosted by IPower.com. All content is developed and maintained by Larry Chapman. Using the World Wide Web (Web) is strongly encouraged in that it provides the Credit Union with a tool to convey information quickly and efficiently on a broad range of topics relating to its products, services, activities, objectives, policies and disclosures.

The Credit Union offers the following services electronically: Web Site-Home Banking-Visa (Link to Visa)

Guidelines:

1. POLICY AND PROGRAM RESPONSIBILITY

- A. Credit Union has established an oversight committee, made up of the following staff, to maintain and monitor the Credit Union's Web site: Board of Directors committee is responsible for maintaining the Credit Union's Web site operations. Any new Web site ideas or initiatives must be reviewed by the oversight committee, which will prioritize, develop, acquire, and maintain any approved Web site applications.
- B. The Credit Union provides management with regular reports on its Web site transactions quarterly.
- C. Management together with the appropriate departments shall work together to provide the necessary resources to adequately support Web Site operations to include equipping staff with the appropriate tools and staff training.

2. COPYRIGHTED MATERIAL. Copyrighted material will be used only when allowed by prevailing copyright laws and may be used only if the materials relate to the Web Site's mission and should be approved by Board of Directors prior to use.

- 3. **EXTERNAL LINKS.** When external links to non- Credit Union Web Sites are included, the Credit Union is responsible for ensuring that a disclaimer is made that neither the Credit Union nor the organization endorses the product at the destination, nor does the Credit Union exercise any responsibility over the content at the destination.
 - A. A disclaimer shall be displayed when linking to external sites. The disclaimer may appear on the page or pages listing external links whenever a request is made for any site other than the official Credit Union Web Site.

4. RISK ASSESSMENT

- A. The Credit Union regularly or quarterly tests the efficacy of its E-commerce systems to ensure proper working order and to prevent security weaknesses.
- B. Management has classified the level of data sensitivity, as well as the potential security risks in the event of a security breach. Management has procedures in place to handle the different levels of intrusion.
- C. The Credit Union regularly monitors security risks associated with technological and operational changes in E-commerce and maintains a current list of critical Web site applications and data that is categorized, quantified, and prioritized

5. COMPLIANCE AND LEGAL

- A. The Credit Union ensures that its Web site will comply with all applicable laws and regulations. The Credit Union also monitors all changes in laws and regulations that affect E-commerce, and updates its E-commerce policies, practices, and systems accordingly in a prompt manner.
- B. The Credit Union has secured bond coverage for all of its Web site policies and procedures. Management has ensured that bond coverage is sufficient in the event of any loss due to an electronic transaction. Bond coverage is regularly assessed to ensure the sufficiency of coverage.
- C. The Credit Union will periodically provide various Web site contracts and agreements with vendors, partnerships, and affiliates to legal counsel for review.
- D. The Credit Union provides disclosures regarding its Web site policies and procedures to members who have entered into E-Commerce relationships with the Credit Union. The disclosures also provide a list of the service providers who have a direct business relationship with the Credit Union. In addition, the Credit Union will place appropriate warnings on its Web site, clearly stating that unauthorized access or use of the Web site is not permitted and may constitute a crime punishable by law.
- E. The Credit Union maintains a Web site privacy disclosure that is available to all members who visit the Credit Union Web site. The Credit Union monitors and enforces compliance with its Web site privacy disclosures.
- F. The Credit Union monitors its Web site on a regular basis to ensure that all disclosures are accurate and up-to-date. The Credit Union will create procedures to validate transactions, e-mails, and other contractual obligations relating to its Web site.

6. AUDIT AND CONSULTING SERVICES

- A. The Credit Union's Web site activities will be subject to periodic independent audits and quality reviews, at least annually, and more frequently when appropriate. At a minimum, these reviews will cover Web site: security, penetration testing, regulatory compliance, privacy, application development and maintenance, incident response and business continuity, and virus detection and protection. The Credit Union management will correct the issues of concern uncovered by the independent audit and/or quality review.

- B. The Credit Union management regularly requires performance testing of its Web site to identify and prevent potential vulnerabilities.

7. MEMBER SERVICE AND SUPPORT

- A. Management has established procedures and practices for promptly resolving member support issues. Management will take steps to ensure that adequate staff levels and training are in place to address member support issues, will monitor reports generated periodically to ensure member service level goals are met and adjusted as needed.

- B. The Credit Union discloses to its members the terms and conditions by which its E-commerce and Web site transactions are conducted, such as:
 - i. The Credit Union's Web site is secure and member account information is kept confidential.
 - ii. Whether the Web site uses cookies, how they are used, and what the consequences are for not accepting them.
 - iii. How member information can be corrected.
 - iv. How member information is used.
 - v. How members can receive additional credit union services (advertisements of other credit union products), and how they can opt out of those services.
 - vi. When members will be notified of credit decisions.
 - vii. How members can request more information or inquire into a refusal of credit.
 - viii. Methods of accepted bill payment.
 - ix. When payment will be posted to the member's account (for after hours transactions).

- x. How members can stop payment.
- xi. The sources of information (i.e. interest rates).
- xii. Inform members of maintenance or other technical issues that may affect access to E-commerce or Web site activities through online messages.
- xiii. Where members can go to resolve errors, pose questions, or register complaints.
- xiv. Inform members of their right to receive paper copies of member account information and procedure to obtain paper copies.

8. PERSONNEL

- A. Employees with access to member account information will receive a copy of the Credit Union's Web site policy. Credit Union. Employees will be notified of the importance of maintaining the confidentiality of member account information and will be made aware of the Credit Union's policies, procedures; standard practices. The Credit Union policy prohibits staff from inappropriately disclosing member account information to any third party.
- B. The Credit Union limits access to sensitive information to specific employees to ensure confidentiality of member account information. Employees have been trained on the proper procedures for filing reports to the appropriate regulatory and law enforcement agencies. Management will routinely monitor employees for compliance with the Credit Union's stated policies, procedures, and standards.
- C. The Credit Union has conducted background checks on its employees, and will thoroughly investigate any allegation of employee misconduct.
- D. Management has instituted a training program in order to maintain continuity of employee support in the event of a termination, transfer, promotion, etc. Employees involved with the Credit Union's Web site transactions are kept up-to-date with changes in the policies and procedures of the Credit Union.

9. SYSTEM ARCHITECTURE AND CONTROLS

- A. The Credit Union maintains an inventory of hardware and software to ensure continuity of service in the event of a technological failure, natural disaster, or intentional destruction of its electronic systems. The Credit Union (or its vendor) maintains procedures to allow the Credit Union to restore its previous configuration in the event a software modification adversely affects the Web site.

- B. The Credit Union has implemented a disaster recovery system as part of its business continuity plan. This system will be monitored regularly and updated as needed as a result of changes in technology, legislation, and infrastructure.

10. SECURITY INFRASTRUCTURE AND CONTROLS

- A. The Credit Union maintains security measures consistent with the requirements of federal and state regulations, including risk management systems designed to prevent unauthorized access, both internal and external, to member information.
- B. The Credit Union has procedures in place to protect member information systems in the event of natural disasters, intentional destruction, or technical failure.
- C. Management monitors employees with access to member account information to ensure they are in compliance with the Credit Union's established security policies and procedures.
- D. All member account information is stored on servers protected with [[2221-8]] to prevent unauthorized access and/or damage. These protections are monitored on a regular basis to assess potential security weaknesses.
- E. Access to member accounts is restricted to members through the use of user ID numbers and passwords. Account passwords that are not entered correctly after the [[2221-9]] time will result in an automatic log-off to the session.
- F. The Credit Union has implemented an intrusion detection system to monitor activity and alert the credit union immediately in the event of a security breach. The Credit Union's oversight committee has been trained to handle such breaches in a timely and effective manner.

11. PERFORMANCE MONITORING. The Credit Union has established and implemented performance standards and monitoring procedures for its Web site activities. These standards and procedures are designed to ensure that the Credit Union's E-commerce and Web site activities are available and efficiently meet member needs and expectations. These procedures are updated on a regular basis, as a result of changes in long-term and short-term plans, as well as in response to member needs.