

# Notice of Privacy Practices

## Our privacy promise to you!

### Affiliated Parties

Capital Communications Federal Credit Union and The Negotiators, LLC are considered affiliates of CAP COM Financial Services, LLC.

References to “we,” “us,” and “our” refer independently to Capital Communications Federal Credit Union and The Negotiators, LLC. References to “you” or “your” shall mean clients of CAP COM Financial Services, LLC, members of Capital Communications Federal Credit Union and clients of The Negotiators, LLC and individuals who are not members or clients but may use a financial product or service we provide, such as making a withdrawal at one of our ATMs, for example.

At CAP COM Financial Services, LLC, Capital Communications Federal Credit Union and The Negotiators, LLC, we are committed to respecting the confidentiality and privacy of your personal financial information. To do our part in ensuring the privacy and security of your nonpublic personal information:

- We do not sell member/client lists;
- We collect, retain, and use information about you only when we believe it is necessary to administer our business or to provide products and services of benefit to you;
- We share information about you only with companies that assist us in offering you services and these companies must contractually honor the privacy principles we set forth; and
- We comply with all applicable privacy laws.

### Information we collect about you

We collect nonpublic personal information about you from the following sources:

- Information we receive from you on applications and other forms completed in order to obtain a product or service (for example, name, address, social security number, assets, and income);
- Information about your transactions with CAP COM Financial Services, LLC, Capital Communications Federal Credit Union, The Negotiators, LLC and those companies that work closely with us (service providers) to provide you with diverse financial products and services;
- Information provided by consumer reporting agencies for the purpose of establishing and maintaining an account or obtaining credit and for any update, renewal, or extension of credit received; and
- Information obtained when verifying the information you provide on an application or other documents.

### Information we share about you

#### *Information Sharing Between Affiliates*

As affiliates, CAP COM Financial Services, LLC, Capital Communications Federal Credit Union and The Negotiators, LLC may share with each other any nonpublic personal information regarding their transactions or experiences with you. This includes, but is not limited to, the ability to view account profile information housed on each company’s respective databases without subjecting the above named affiliates to breach of confidentiality claims. However, Capital Communications Federal Credit Union shall not share with CAP COM Financial Services, LLC or The Negotiators, LLC information regarding its members taken from consumer credit reports.

#### *Information Sharing With Third Parties*

We will not share nonpublic personal information with third parties who do not have an affiliation with us. We may, however, share such information with the following categories of third parties:

- Third Party Service Providers

Third party service providers are companies that administer or perform services on our behalf. Third party service providers include our data processors, credit and debit card processors, check printers, check clearing companies, collection companies, real estate attorneys, licensed

brokers and investment companies, IRA service suppliers, consulting companies, and statement processors and mailers.

- Companies with whom we have joint marketing agreements
- We may share information with companies that perform marketing services on our behalf and with whom we have joint marketing agreements with privacy and confidentiality provisions in place.

- Legal, regulatory and auditing

We share information with these parties when information sharing is necessary to conduct a criminal investigation, to satisfy certain regulatory and audit requirements, and to comply with IRS and state government information reporting requirements;

- We may also disclose information about you under other circumstances as permitted or required by law or regulation.

### Disclosure of information about former members/clients:

If you terminate your membership or cease to be a client, we will not share information we have collected about you, except as may be permitted or required by law or regulation.

### How we protect your information

Our employees are educated about the importance of maintaining confidentiality and member/client privacy. In order to prevent unauthorized access to your personal information, we also maintain physical, electronic, and procedural safeguards that comply with federal and state regulations, as applicable, to guard your information and these safeguards are routinely tested to verify the integrity of the systems and controls in place.

### What you can do to help protect your account

CAP COM Financial Services, LLC and their affiliates are committed to protecting the privacy of its members and clients. You can help by following these simple guidelines:

- Protect your account numbers, card numbers, PINs (personal identification numbers), and passwords. Never keep your PIN with your debit or credit card as doing so provides easy access to your accounts if your card is lost or stolen.
- Use caution when disclosing your account numbers, social security numbers, or any other sort of identifying information to other persons. If you are at all suspicious about such a call, ask for the name and phone number of the person calling. If it’s a legitimate call, the caller should have no problem disclosing this information and it will provide you with the opportunity to verify the legitimacy of the call. If the call is not legitimate, the caller will most likely just hang up. If this occurs please contact us and let us know that you received such a call.
- Keep your information current. It is important that we have current information on how to reach you. If we detect potentially fraudulent or unauthorized activity or use of an account, we will attempt to contact you immediately so if your address or phone number changes, please let us know.
- **Under no circumstances will CAP COM Financial Services, LLC and/or their affiliates ever contact you by telephone, mail or e-mail to request your account numbers or other private identity information. If you receive such a request, do not respond and let us know immediately.**
- Let us know if you have questions about any of our practices, our policies, or these privacy procedures.

CAP COM Investment Services — Securities and insurance products offered through LPL Financial and its affiliates, Member FINRA/SIPC a Registered Investment Advisor. CAP COM Investment Services is a division of Capital Communications Federal Credit Union. Investments are not NCUA insured, are not obligations of the Credit Union and are not guaranteed by the Credit Union. They may involve risk, including loss of principal. Financial planning and insurance offered through CAP COM Financial Services, LLC.