
Due Diligence Information

TruStage® Insurance Program

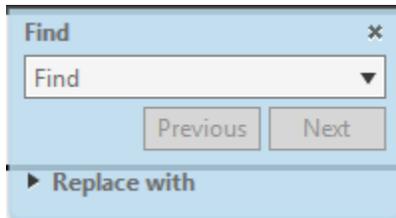


This information is provided to fulfill your credit union's due diligence obligations involving third party relationships.

In providing this information, we want to remind you that the information is confidential and proprietary to CUNA Mutual Group. Product or program specific due diligence information may also be attached.

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3. Enter your **'topic'** of interest in the Find field



4. Click **Next**, the **Find** function will highlight the matches in blue.
5. Navigate through the matches with the **Previous** and **Next** buttons

We trust the attached information will satisfy the fulfillment of your due diligence obligations. If you have any questions, please contact us.

TruStage Insurance Program

Privacy Frequently Asked Questions



Protecting member privacy is a priority for the insurance companies of the CUNA Mutual Group. Our physical, electronic, and procedural safeguards combine to protect nonpublic personal information in accordance with applicable federal and state laws and regulations. Through cooperative efforts between credit unions and the TruStage Insurance Program, credit unions can protect their members' privacy and maintain compliance with all applicable laws and regulations.

Question	Response
Under the TruStage Insurance Program is it permissible for credit unions to share membership information with CUNA Mutual Group?	Yes, as long as the credit union follows the requirements set forth in the National Credit Union Association Consumer Privacy Rule, 12 C.F.R. Part 716 (NCUA §716). This Rule allows sharing of nonpublic personal information to nonaffiliated third parties as long as (1) the credit union provides their members with a privacy notice that contains language stating they disclose information to third parties; and (2) there is a contractual agreement between the parties that prohibits disclosing or using the information other than to carry out the purpose for which the information is disclosed.
Do credit unions have to offer an 'opt out' to members at the time they send out their privacy notice?	As long as the credit union provides the privacy notice and meets the contractual obligations of NCUA §716, no opt out is required to be provided to the members. (Some state variations may apply) (See, NCUA §716.13(a)(1), FTC §313.13(a)(1) CUNA Mutual Group's TruStage Insurance Program includes a Joint Marketing Agreement between the credit union and CUNA Mutual Group that includes a provision that requires the parties to protect members' nonpublic personal information. Credit unions should check with their legal counsel to determine if there are any state variations that may require an opt-out.
Do the same requirements apply if the member requests a service or initiates a transaction?	The requirements of the initial notice and opt out do not apply if the credit union discloses nonpublic personal information as necessary to effect, administer, or enforce a transaction that a consumer requests or authorizes, or in connection with any of the following: <ul data-bbox="678 1423 1442 1738" style="list-style-type: none">• Servicing or processing a financial product or service that a consumer requests or authorizes.• Maintaining or servicing the consumer's account with the credit union, or with another entity as part of a private label credit card program or other extension of credit on behalf of such entity.• A proposed or actual securitization, secondary market sale (including servicing rights) or similar transaction related to a transaction of the consumer. (See, NCUA §716.14, FTC §313.14)
Are credit unions an affiliate of CUNA Mutual Group?	No. The insurance companies of the CUNA Mutual Group are separate entities that may engage in joint marketing with credit unions. CUNA Mutual Group is the marketing name for CUNA Mutual Holding Company, a mutual insurance holding company,

Question	Response
	its subsidiaries and affiliates.
Does the Gramm-Leach-Bliley Act (GLBA) prohibit financial institutions from sharing information such as Social Security numbers and date of birth with nonaffiliated third parties?	<p>In general, as long as credit unions notify members in their privacy notices that they share nonpublic personal information, credit unions can share this information under GLBA requirements. Nonpublic personal information is broad and includes any personal information the credit union obtains through the course of doing business with the member. For most member information sharing activities, it typically includes the person's name, address, Social Security number, birth date and telephone number. Also included is member relationship information in a credit union such as effective dates, termination dates, product codes (Share Savings, Share Draft, etc.) For more information See, NCUA §716.3 & §716.6.</p> <p>Keep in mind apart from GLBA, information sharing requirements do vary at the state level. There may be state laws in place that prohibit sharing certain types of data.</p>
What impact does the federal model privacy notice have?	<p>In late 2009, the National Credit Union Administration and seven other federal agencies (Agencies) released a final model privacy notice form (Federal form). The previous rules permitted financial institutions to use model language (called Sample Clauses) in their privacy notices. The Federal form is designed to replace the Sample Clauses and make it easier for consumers to understand how financial institutions collect and share their personal information. The Federal form is intended to simplify privacy notices for consumers and create uniformity for comparison purposes. Credit unions should check with their legal counsel to determine if there are any state variations that would affect the credit union's ability to use the federal model privacy notice.</p>
What assistance will CUNA Mutual Group provide to credit unions with their privacy notice obligations?	<p>CUNA Mutual Group's LOANLINER® Deposit Documents can assist your credit union in creating a tailored Privacy Disclosure that may be provided with other disclosures during the membership/account opening process. The disclosure may also be used to fulfill annual notice requirements by inserting it with quarterly or monthly statements for ease of distribution to members. You may initiate an order for the LOANLINER® Privacy Disclosure by completing and submitting the Privacy Disclosure Order Request and Questionnaire. You may obtain the Order Request and Questionnaire by calling 800.356.5012 (option #1) or by visiting www.loanliner.com (click 'LOANLINER Compliance Solutions' on the left-hand side of the page; then submit an inquiry).</p>

Question	Response
<p>With the amendment to the GLBA annual privacy notice requirement, credit unions no longer need to send an annual privacy notice as long as they meet certain conditions, including not sharing information with nonaffiliated third parties. How does this affect our sharing practices under the TruStage Insurance Program?</p>	<p>The Fixing America's Surface Transportation (FAST) Act became effective in December, 2015. It contains a privacy notice provision based on the Eliminate Privacy Notice Confusion Act. The provision amends the Gramm-Leach-Bliley Act (GLBA) annual privacy notification requirements.</p> <p>The 2015 GLBA amendment eliminates the annual privacy policy notice requirement for an institution that does not share information with nonaffiliated third parties (and extends to those that share through some exceptions) and does not change its privacy policy from the last time it was disclosed.</p> <p>In August of 2018, the Bureau of Consumer Financial Protection (aka CFPB) finalized a privacy rule implementing the 2015 GLBA amendment. The privacy rule clarifies that if the financial institution meets the exceptions to not provide the annual privacy notice, they no longer must use the "alternative method" of posting a privacy notice on the website for annual purposes (however, there is no penalty for continuing that practice). Initial privacy notice requirements are not impacted by the 2015 GLBA amendment nor the 2018 implementing privacy rule.</p> <p>Both the GLBA amendment and the CFPB rule generally apply to federally chartered credit unions that share member data with nonaffiliated third parties under certain exceptions, which includes sharing nonpublic personal information to perform services for or functions on behalf of the financial institution and marketing of the financial institution's own products or services, or financial products or services offered pursuant to joint agreements between two or more financial institutions. The financial institution must fully disclose the providing of such information and also enter into a contractual agreement with the third party that requires the third party to maintain the confidentiality of such information. Our TruStage program falls under the joint marketing exception. An exception also exists for sharing to service providers, law enforcement, or as necessary to fulfill a transaction requested by the customer.</p> <p>Credit unions should ensure they understand any state laws that continue to require the annual privacy notice.</p>

The TruStage Auto & Home Insurance Partner Management Team conducts regular reviews with our strategic partners and their technology security practices.

- CUNA Mutual Group takes security related to external strategic partnerships seriously. To that end, audits with strategic partners take place on a regular basis and include SSAE 16 reporting, compliance with Gramm-Leach-Bliley Act (GLB), and statements of security and privacy practices. These reviews take place as part of the selection process, before ever doing business with a strategic partner, and then on a regular basis, annually if appropriate.
 - Data security:
 - Our partners have computer security procedures in place to protect all personal information of their policyholders.
 - Our partners ensure physical security measures are in place to control physical access to systems or outputs that contain personal data and privileged information.
 - Only necessary information is gathered and stored for only as long as it is needed; when it is no longer needed it is properly disposed of in a safe and secure manner.
 - Data privacy:
 - Our partners have privacy practices and controls in place that are in full compliance with state insurance codes and all applicable regulatory requirements.
 - Our partners are limited in the data they share back with CUNA Mutual Group. For example, we only receive data that is necessary to maintain business processes.
- Annual reports are available at [Liberty Mutual](#).

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- To learn more about GoHealth, go to [GoHealth](#).