

PRIVACY POLICY

PRIVACY OF CONSUMER FINANCIAL INFORMATION AND PERSONALLY IDENTIFIABLE INFORMATION (PII)

PURPOSE AND OBJECTIVES

This policy reaffirms NeighborWorks® Western Pennsylvania's realization of and respect for the privacy expectations and rights of our customers regarding financial information and other related information which NeighborWorks® Western Pennsylvania has or gathers in the normal course of business. It is intended to provide guidance to NeighborWorks® Western Pennsylvania personnel as well as assurance to our customers. PII may reside in hard copy or electronic records; both forms of PII fall within the scope of this policy. We will also, of course, act in compliance with all applicable laws and regulations.

DEFINITIONS

Employee. As used in this policy, employee includes all directors, officers, and employees of NeighborWorks® Western Pennsylvania as well as any attorneys, agents, or outside vendors who become privy to customer information.

Customer. A person who has established a relationship with NeighborWorks® Western Pennsylvania.

Nonpublic personal information. Personally identifiable information relating to a customer, except when there is a reasonable belief that the information is publicly available. For example, the fact of a customer relationship with NeighborWorks® Western Pennsylvania would presumably be nonpublic personal information. It is only if personally identifiable information relating to a customer is publicly available that such information is excluded from nonpublic information.

Publicly available information. Any information that NeighborWorks® Western Pennsylvania has a reasonable basis to believe is lawfully made available to the general public from federal, state, or local government records; widely distributed media; or disclosures to the general public that are required to be made by federal, state, or local law. (For example, a published telephone directory or the public record of real estate transactions.)

RESPONSIBILITY

The Board of Directors has the ultimate responsibility to appropriately establish and maintain this policy and assure that it is being observed in the daily operations of NeighborWorks® Western Pennsylvania.

The Chief Executive Officer is responsible for carrying out this policy and making recommendations to the Board of Directors as to necessary or desirable changes to the policy.

PRIVACY PRINCIPLES

NeighborWorks® Western Pennsylvania recognizes the following eight elements of its privacy policy, which have become standard within the NeighborWorks® Western Pennsylvania industry:

1. Recognition of customer's expectation of privacy
2. Use, collection, and retention of customer information
3. Maintenance of accurate information
4. Limiting employee access to information
5. Protection of information via established security procedures
6. Restrictions on the disclosure of consumer information
7. Maintaining customer privacy in business relationships with third parties
8. Disclosure of privacy principles to customers
9. Destruction of personally identifiable information

RECOGNITION OF CUSTOMER EXPECTATION OF PRIVACY

Customers of NeighborWorks® Western Pennsylvania are entitled to the absolute assurance that the information concerning their financial circumstances and personal lives, which NeighborWorks® Western Pennsylvania has obtained through various means, will be treated with the highest degree of confidentiality and respect. Certain expectations of privacy also contain legal rights of customers which are either granted or confirmed to them through various federal and state laws and regulations. All employees are directed by this policy to assure customers of NeighborWorks® Western Pennsylvania's commitment to preserving the privacy of their information.

USE, COLLECTION, AND RETENTION OF CONSUMER INFORMATION

It is the policy and practice of NeighborWorks® Western Pennsylvania to collect, retain, and use information about customers (both individual and corporate) only where NeighborWorks® Western Pennsylvania reasonably believes the gathering of such information would be useful and allowed by law

to administer NeighborWorks® Western Pennsylvania's business and/or to provide products, services, or opportunities to its customers.

LIMITATION ON EMPLOYEE ACCESS TO INFORMATION

The Chief Executive Officer will take all steps necessary to ensure that only employees with a legitimate business reason for knowing personally identifiable customer information shall have access to such information. To the extent practicable, access will be limited by computer access codes and granting limited access to areas in which sensitive customer information is retained. Employees will be informed at the time of their initial employment of these standards and periodically reminded of these standards during training sessions at least once during each calendar year. Willful violation of this element of this policy will result in disciplinary action against the offending individual. Inadvertent violations will be dealt with in a manner to ensure that such violations are not repeated.

PROTECTION OF INFORMATION

NeighborWorks® Western Pennsylvania will maintain appropriate security standards and procedures to prevent unauthorized access to customer information. Such procedures should prevent access by not only unauthorized employees, but others as well. Such others include but are not limited to all non-employees with otherwise legitimate reasons for being on NeighborWorks® Western Pennsylvania' premises, computer hackers, and all intruders.

GENERAL RESTRICTIONS ON THE DISCLOSURE OF CUSTOMER INFORMATION

NeighborWorks® Western Pennsylvania will not, except in cases allowed under the law, reveal specific information about customer accounts or other nonpublic personal information to any nonaffiliated third parties.

BUSINESS RELATIONSHIPS WITH THIRD PARTIES

If NeighborWorks® Western Pennsylvania is requested to provide personally identifiable information to a third party, from which the consumer has no right to opt out, and that request is in all respects consistent with other elements of this policy, NeighborWorks® Western Pennsylvania will accede to the request only if NeighborWorks® Western Pennsylvania believes that the party adheres to similar privacy principles, no less stringent than set forth in this policy, that provide for keeping such information confidential.

NeighborWorks® Western Pennsylvania will not enter into an agreement with any entity without first requiring the entity to maintain the confidentiality of the information to at least the same extent that NeighborWorks® Western Pennsylvania must maintain that confidentiality and limit the third party use of the information solely to the purposes for which it is disclosed or as otherwise permitted by law.

NeighborWorks® Western Pennsylvania will review all contracts that it has with third party vendors and service providers to ensure that the contracts stipulate that information shared must be protected. If the third party provider cannot comply with NeighborWorks® Western Pennsylvania's policy, NeighborWorks® Western Pennsylvania will seek an alternative provider.

STORAGE AND DESTRUCTION

NWWPA's COFO is responsible for the ongoing process of identifying records with PII that have met the required retention period per NWWPA's Document Retention Policy and overseeing their destruction. Destruction of financial, personnel-related and client documents will be accomplished by shredding.

Document destruction will be suspended immediately, upon any indication of an official investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation.

Copies of documents containing PII will be stored in a safe, secure location. Access will be limited and controlled by NWWPA's COFO.

EMPLOYEE EDUCATION AND TRAINING

The hiring supervisor will provide a copy of this policy to all NeighborWorks® Western Pennsylvania employees and to obtain a receipt from each employee acknowledging that fact. After any amendments or modifications to this policy have been duly adopted, a copy of the amended policy will also be given to each employee, again acknowledged by receipt. Receipts will be obtained and placed into the employee's file.

RECORD KEEPING AND REPORTING

The Chief Executive Officer will maintain a separate file for the purpose of retaining any customer complaints that relate to this policy. The information regarding any complaint should include the exact nature of the complaint, describe the corrective actions taken, and confirm that the corrective actions resolved the complaint.

The Chief Executive Officer will make an annual report to the Board concerning customer complaints which shall include the frequency and nature of such complaints and corrective actions taken. Complaints of a nature sufficient to present a risk of regulatory enforcement action and/or civil money penalties are required to be reported if and when they occur.

REVIEW OF POLICY

The Board of Directors will make a review of this policy at least once each year and make any revisions and amendments it deems appropriate. The Chief Executive Officer will be responsible for suggesting more frequent revisions as situations or changes in laws or regulations dictate.

Excerpted from NeighborWorks Western Pennsylvania's Employee Guidebook, pp. 23-26.

Last revised July 9, 2019