

## **PRIVACY DISCLOSURE**

### 25 de mayo de 2022

#### **General Policy**

At The Cooperativa, our mission is to fulfill the desires of our customers. As a financial institution you have entrusted us sensitive financial information and we respect the privacy of our customers and are committed to treat it responsibly. Privacy principles on our customer's personal information, serve as policy for all employees of the Cooperativa at the time of collection, use, retain and ensure each customer's individual information.

### **Recognition of Expectation of Privacy**

The Cooperative believes strongly in confidentiality and protection of customer information and recognize it as one of our most fundamental responsibilities. Although the information is crucial to providing quality services, we recognize the trust of our customers as one of our most valuable assets and their right to expect that such information is kept private and secure. The Cooperativa will maintain strict standards of confidentiality to safeguard your information and ensure that it remains private and protected at all times.

#### **Restrictions on the Disclosure of Financial Information**

The Cooperativa does not share private information of our customers with outside institutions or entities, unless (1) you request or authorize, (2) the information is provided to help complete a transaction initiated by you, (3) information is provided to a reputable credit agency, or (4) the disclosure is permitted or is under the law (subpoena, fraud investigation, is required by regulators of the Cooperativa, legal, etc.). As an exception, and as permitted by law, we may provide information to companies that provide a product or service that is of benefit to our customers. When sometimes decide to share such information will only be that necessary to achieve the above purposes. In addition, we require those companies under contract to maintain strict confidentiality of the information and limit its use solely for the purposes for which it was provided.

Not use or share-internally or externally, personally identifiable medical information for any purpose other than to claim the policy of a client, as you inform the customer to obtain the information. Similarly, the Cooperativa will not provide personal information or account information in our institution to other entities for the purpose of independent telemarketing or direct mail marketing of financial products or services offered by them.

#### **Security Measures on the Internet**

The Cooperativa is also committed to protect your confidential information in the Internet. To prevent unauthorized access to your confidential information by employees and third parties, we have implemented the following security measures and procedures for Internet:

- (1) The web site is physically located within the secure facilities of the Cooperativa.
- (2) Our Internet network is equipped with the latest operational and maintenance systems on the market. The functions of these systems include, but are not limited to, intrusion detection, software patches and upgrades, network monitoring, account monitoring, maintenance and tracking among others.
- (3) Access by employees and third parties to Personal Information is restricted to authorized personnel of the Cooperativa and its affiliates. Any unauthorized access to your information by our employees is subject to disciplinary action.
- (4) Access to all equipment connected to the Internet, is also restricted to authorized personnel of the Cooperativa.

# **Maintenance of Information**

The Cooperative has established procedures to ensure that your financial information is accurate, current and complete, according to industry standards. If you believe our records contain inaccurate or unclear information, please notify the Cooperativa. Your concern will be investigated and corrected for any inaccuracies as quickly as possible.

# Limitations on Access to Information by the Staff

Each employee of the Cooperativa is obligated to follow the Code of Ethics and Standards of Conduct which provides that Institutional information of all our clients is considered private and privileged and will be used solely for the purpose of providing the most excellent service available. Access by staff to customers' personal information is limited to those with a business reason to know it well. Personnel who violate our Privacy Policy will be subject to disciplinary measures.

### **Security Measures Established**

The Cooperativa is committed to ensuring your personal and financial information. We safeguard information according to the procedures and safety standards recognized in law and policy. Our information system is located in a safe access by third parties. Staff are trained to understand and meet our safety measures.

## Complaints

The Cooperativa recognizes and respects the privacy expectations of its customers. We want our customers understand our commitment to privacy on the information you share. As a result of our commitment, we have developed these privacy principles which we make available to our customers. Customers who have questions concerning this Privacy Policy or the privacy of your financial information can call (787-764-3366), and ask for one of our Customer Service employee

