



October 2014

Dear CU PolicyPro Clients,

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Technical FAQ

Question: How do I remove the URL from the bottom of the printed policies?

Answer: Because the published manual and “print view” options are HTML documents printing from a Web site, your Internet Page Set Up options will apply when you print any policy from the manual. Many Internet Page Set Up options call for the URL to print on the header and/or the footer of the page. To remove the URL:

Go to the “File” menu on your Internet Browser navigation bar, and choose “Page Set Up”.

A pop up box will open with the Page Set Up options.

The Header and Footer options allow you to choose what shows in the Header or Footer of your printed documents. Many credit unions choose to remove all header and footer codes. Depending on your browser, the header and footer settings may be selected from a dropdown box, or you may have to delete code from the Header and Footer fields.

Note: These settings will apply to all documents printed off the internet from your computer. You may want to copy the current header and footer settings to a Word document so you can add them back in later. You may not want the URL to print on your manual, but you might want it for printing from other web sites.

Also, these settings apply to a particular computer. A user printing the policies from another computer may also have to adjust their settings.

[Click here for this and other printing tips.](#) The header/footer information is on page 1.

If you have additional questions, please contact the CU PolicyPro Support Team at polycysupport@cusolutionsgroup.com.

Content FAQs

Question. Does the credit union still need to provide members with a privacy notice?

Answer. Yes, the credit union must still provide the privacy notice to members annually; however, the credit union may qualify for and choose to post their privacy policy on their website, and as long as they meet all other regulatory requirements would not need to mail the notice to members.

Question. If our credit union chooses the alternate delivery method available through the revision to Regulation P what would be required?

Answer. If the credit union meets the 5 requirements for providing the alternate delivery method to members it would have to:

1. Inform members in a clear and conspicuous manner, not less than annually, on an account statement, coupon book, or a notice or disclosure required or allowed by law:
 - a. That your privacy notice is available on your website;
 - b. The privacy notice will be mailed to members who request it by telephone;
 - c. Include a statement that the credit union's privacy notice has not changed; and
 - d. Include a specific Web address that takes the member directly to the page where the privacy notice is posted and a telephone number for the member to request that it be mailed.
2. Post your current privacy notice in a continuous, clear and conspicuous manner on a page of your website where the only content is the privacy notice. It may not be posted where a login name, password, or similar steps or agreeing to any conditions to access the page are required to access; and,
3. Mail your current privacy notice to members who request it by telephone within ten (10) days.

Monthly OPS Notes Release: CFBP Publishes Final Privacy Rule

The Consumer Financial Protection Bureau recently published its long-awaited final revisions to Regulation P, which provides credit unions with some minor regulatory relief with annual privacy notice requirements. Regulation P requires credit unions disclose to their members how they share their members' non-public personal information. Credit unions are required to provide members with a disclosure of their privacy policies at least annually and at account opening. The recent amendment creates an alternative delivery method for this annual disclosure which credit unions will be able to use only under certain circumstances.

To comply with the annual privacy notice alternative delivery method prescribed by the revised regulation, the credit union would be required to post their current privacy notice in a continuous, clear and conspicuous manner on a page on their websites, where the only content is the model form privacy notice. The credit union cannot utilize or request a login name or any other steps that would require a member or potential member to agree to certain conditions to access the page.

The credit union will also have to notify the membership in a clear and conspicuous manner, at least annually, via an account statement, coupon book, or notice/disclosure that:

- The credit union's privacy notice is available on its website;
- That the Privacy Notice will be mailed to members who request it by telephone; and
- That no changes have been made to the notice.

If a member requests a Privacy Notice be mailed to them this would have to be completed within 10 days of

the request.

The credit union can use the alternative delivery method of posting its privacy notice on its website only if the following conditions are met:

1. The credit union does not disclose nonpublic personal information about members to non-affiliated third parties in a manner that triggers opt-out rights (in other words, non-personal information is only shared as allowed by one of the exceptions to the regulation as described in 12 CFR §1016.13, §1016.14, §1016.15);
2. The credit union does not include on its annual privacy notice, the Fair Credit Reporting Act affiliate sharing opt-out notice (12 CFR §603(d)(2)(A)(iii));
3. The requirements of the Fair Credit Reporting Act Affiliate Marketing Rule, if applicable, have been satisfied previously, or the annual privacy notice is not the only notice provided to satisfy this requirement (§624);
4. The information included in the privacy notice has not changed since the member received the previous notice (whether initial, annual, or revised), other than to eliminate categories of information you disclose or categories of third parties to whom you disclose information; and
5. The credit union uses the model privacy form provided in the regulation.

This Regulation P revision will be final when the Consumer Financial Protection Bureau posts it in the Federal Register. Revisions to Policy 1615 – Privacy will be published in CU PolicyPro in the December update.

This edition of OPS NOTES was prepared by the Michigan Credit Union League.

ComplySight Streamlines Compliance Management

ComplySight serves as your credit union's universal compliance management tool providing tracking, visibility and measurement to address compliance initiatives through a single application. This powerful program automatically provides your credit union with regulatory alerts and updates and streamlines compliance management in your credit union. ComplySight originates from a collaboration of League InfoSight, CUNA, and Association/Leagues whose affiliation results in a strong credit union focused compliance solution. For more information, [click here](#).

Questions?

If you have any questions regarding the CU PolicyPro content, or questions on how to use the system, please contact polycysupport@cusolutionsgroup.com.

If this information was forwarded to you, and you'd like to be on the distribution list to receive information and updates related to CU PolicyPro, contact polycysupport@cusolutionsgroup.com.

Thanks and have a great week!