### Exchange Credit Program Privacy Policy

Protecting your privacy is important to us. We adhere to the Privacy Act, 5 U.S.C. 552 et seq., as well as the Rights to Financial Privacy Act, 12 U.S.C. 3401 et seq. We collect nonpublic personal information about you from the following sources:

- · Information we receive from you on applications or other forms.
- · Information about your transactions with us or others.
- · Information we receive from a consumer reporting agency.

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law. We restrict access to nonpublic personal information about you to those employees who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

To review our Privacy Notice Click here.









## **FACTS**

# WHAT DO THE ARMED SERVICES EXCHANGES ("EXCHANGES") DO WITH YOUR PERSONAL INFORMATION?

#### Why?

Financial companies choose how they share personal information. Federal law gives customers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- · Social Security number and income
- Account balances and payment history
- · Credit history and credit scores

When you are *no longer* our customer, we continue to share your information as described in this notice.

How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons the Exchanges choose to share; and whether you can limit this sharing.

Reasons we can share your personal information	Do the Exchanges share?	Can you limit this sharing?
For our everyday business purposes — such as to	Yes	No
process your transactions, maintain your account(s),		
respond to court orders and legal investigations or		
report to credit bureaus		
For non-affiliate marketing purposes —	No	We Don't Share
to offer their products and services to you		
For joint marketing with other financial companies	No	We Don't Share
For our affiliates' everyday business purposes —	No	We Don't Share
information about your transactions and experiences		
For our affiliates' everyday business purposes —	No	We Don't Share
information about your creditworthiness		
For our affiliates to market to you	No	We Don't Share

**Questions?** 

Call 1-877-891-7827 or go to www.myECP.com

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Who we are	
Who is providing this	Army and Air Force Exchange Service, Navy Exchange, Marine
notice?	Corps Exchange, and Coast Guard Exchange (the "Armed
	Services Exchanges" or the "Exchanges")
What we do	
How do the Exchanges protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How do the Exchanges collect my personal information?	<ul> <li>We collect your personal information, for example, when you</li> <li>Open an account or pay your bills</li> <li>Pay us by check or use your credit or debit card</li> <li>Show your government-issued ID</li> <li>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</li> </ul>
Why can't I limit all sharing?	<ul> <li>Federal law gives you the right to limit only</li> <li>sharing for affiliates' everyday business purposes — information about your credit worthiness</li> <li>affiliates from using your information to market to you</li> <li>sharing for non-affiliates to market to you</li> <li>State laws and individual companies may give you additional rights to limit sharing.</li> </ul>

Definitions	
Affiliates	Companies related by common ownership or control. They can be
	financial and nonfinancial companies
	<ul> <li>The Exchanges do not share with their affiliates.</li> </ul>
Non-affiliates	Companies not related by common ownership or control. They can be
	financial and nonfinancial companies.
	<ul> <li>The Exchanges do not share with non-affiliates so they can market to you.</li> </ul>
Joint Marketing	A formal agreement between nonaffiliated financial companies that
	together market financial products or services to you.
	The Exchanges do not jointly market.

#### PRIVACY ACT STATEMENT

**AUTHORITY:** 10 U.S.C. 7013 and 9013; Federal Claims Collection Act of 1966 and Debt Collection Act of 1982 as amended by the Debt Collection Improvement Act of 1996 codified in 31 U.S.C. §3711; 31 CFR 285.11, Administrative Wage Garnishment; DoDI 1330.21; DoD 7000.14-R, Volume 13 and Volume 16; AR215-8/AFI 34-211(I); and E.O. 9397 (SSN), as amended.

**PRINCIPAL PURPOSE(S):** To determine individual's credit worthiness, monitor account activity, process account purchases, payments and/or collections, answer account questions, determine indebtedness, administer and respond to questions about the Federal Claims Collection Act, and post to Exchange Accounts Receivable.

**ROUTINE USE(S):** Your records may be disclosed outside of DoD pursuant to Title 5 U.S.C. §552a(b)(3) regarding DoD "Blanket Routine Uses" published at http://dpcld.defense.gov/Privacy/SORNsIndex/BlanketRoutineUses.aspx **Disclosure:** Voluntary. However, failure to provide requested information may result in denial of credit. The Exchange Privacy Impact Assessment may be viewed https://www.aafes.com/Images/AboutExchange/FOIA-PIA.pdf