

# Omega Financial, Inc. Privacy & Data Security Policy

*Effective May 2004*

At Omega Financial, Inc. ("Omega") your privacy and the security of your data is a top priority. We pride ourselves on our ability to be your chapter's partner for financial success. In order to be this partner, we help fraternities and sororities manage their membership and alumni/ae data, and we collect and process payments and contributions from those members and alumni/ae for Greek organizations. This Privacy and Data Security Policy describes the privacy policies applicable to Omega's business operations and websites.

## **Data Collection**

One of Omega's primary services is to collect, maintain and manage individually identifiable information about chapters, their undergraduate members and new members and their alumni/ae. As a result, we maintain contact information, addresses, phone numbers, email addresses, social security numbers, giving and payment information and other personally identifiable information about individuals. We obtain this information from your chapter, alumni/ae organizations associated with your chapter and your Inter/National Headquarters. We also obtain this information from transactions you initiate and information you provide to us.

From time to time, we also compile online transaction and registration information for internal analyses and internal marketing purposes.

## **Information Sharing**

Omega never sells or provides any data or personally identifiable information except as authorized by our customers or their members.

In order to serve your needs, we may share information with:

- Credit card processors and financial institutions when necessary to process payments made by you and to comply with applicable law;
- Lawyers and collection agents only when instructed and authorized by our customers to fulfill the terms of our agreement with our customers;
- The U.S. Post Office and printing and mail house specialists in order to communicate with you;
- Your Inter/National Headquarters in an effort, to keep you, your chapter and its members and alumni/ae informed about the national fraternity/sorority.

In order to enhance and strengthen the alumni relations program for our customers, name, address, phone number and email information about their alumni/ae is published on the Internet as a component of a customer's website.

When necessary or appropriate, we may disclose information in response to a court order or subpoena or when otherwise legally required.

To protect your confidential information, we only work with companies and financial institutions that agree to maintain strong confidentiality protections and limit the use of the information we provide. We do not permit these companies to sell to other third parties the information we provide to them.

### **Confidentiality and Security Safeguards**

Omega takes physical, electronic and procedural safeguards to protect against anticipated and unanticipated hazards to the information that is stored about our customers, chapters, chapter members and their alumni/ae. Data is electronically backed-up every night. Back-up tapes are stored in secure locations off-site each week.

We protect customer data and accounts by asking you for information that only you should know when you contact us. We follow these procedures in our financial centers, on the phone and via the Internet.

We train our employees to protect customer information. Omega employees who have access to confidential information must treat it confidentially and may not disclose it to unauthorized parties. Employees who violate Omega's privacy policy are subject to a range of disciplinary actions.

### **Web Site Data Collection**

A visitor to the Omega website who does not log-in, is not asked to reveal any individually identifiable information. We collect some non-personally identifiable information about visitors through standard weblogs, including IP address, what browser is being used and the domain name from which a visitor entered our site. Some data may be traced to an individual, but we do not normally seek to identify individuals unless we believe that someone is using our site improperly.

### **Member Access Plus and Chapter DeskTop**

Some existing customers and chapter members come to our website with IDs and passwords already assigned. Others who register at our website provide standard contact information such as name, mailing and email address, chapter name, college/university name and telephone numbers. We may also obtain credit card number information from those who pay online.

When you sign in to the Omega system, your ID and password are sent over the Internet from your computer to ours using Secure Socket Layer (SSL) technology. SSL encrypts your personal information before it leaves your computer, ensuring that no one else can read it.

### **Cookies**

We use an Internet device called a cookie to store login or other information on your computer. A cookie is a small file that a website transfers to your computer's hard drive. We use cookies to

simplify your access and to make our website work for you. For some services, we offer users the choice of having an ID or password stored in a cookie so that you do not have to reenter it when you return to the site. We do not store credit card numbers in cookies. No other site can read a cookie, and we cannot read a cookie that another website wrote to your computer. Most Internet browsers are set to accept cookies. To fully use our website, you must enable your Internet browser to accept cookies. If you choose not to accept cookies, some websites may not display properly or you may not be able to access certain information.

### **Privacy of Children**

The Omega website and services provided by Omega are not directed to children under the age of 13. We operate our website in compliance with the Children's Online Privacy Protection Act and do not permit registration by, and will not knowingly collect or use personally identifiable information from, anyone under 13 years of age.

### **Updates to this Privacy Policy**

To keep up with the rapidly evolving Internet environment and changing legal requirements, Omega will from time to time review and revise this Privacy Policy. When any change is made to this policy, we will revise the effective date at the beginning of this policy. Individuals and chapters are encouraged to check back often to learn about any changes to this policy.

### **For More Information**

For more information regarding this Privacy Policy, please contact

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