

Text Usage Policy

Policy Statement

As many consumers gravitate toward texting as a preferred method of communication, Autotruck Financial Credit Union (hereinafter Autotruck) does employ the usage of text communication with members in situations and circumstances where it makes business sense to do so. The usage of text communication shall be viewed as one tool which may be situationally conducive to the service of our members. It is not intended as a replacement for other communication tools, phone calls, letters, etc when and where those forms of communication may be more effective or preferred by an individual member. Any and all text utilization shall be done in full compliance with the Telephone Consumer Protection Act, and with any regulatory standards set forth by the mobile carrier industry.

Prior Consent

In distinguishing the type of consent required, it is important to note the difference between each generally accepted category of text communications.

Message Type	Description	Examples	Opt-In Requirements
<i>Account-Related</i>	Messages which respond to a consumer's inquiry or request, or which provide the consumer information necessary to manage their account(s)	<ul style="list-style-type: none">• Responding to a consumer's inquiry or application• Interacting with an application through the process of obtaining an account or service• Providing notifications of potential fraud or identity theft• Providing notifications of account status	Expressed Consent
<i>Informational</i>	Messages which provide basic operational information	<ul style="list-style-type: none">• Notifying members of revised hours due to inclement weather• Notifying members of important operational adjustments in the event of a Disaster, Pandemic, etc	Expressed Consent
<i>Marketing</i>	Messages which have the intent of promoting a product, service, or other goods	<ul style="list-style-type: none">• Soliciting interest in a product or service• Cross-selling a product or service	Prior Specific Consent

- *Expressed Consent*

For *Account-Related* and *Informational* messages, regulations simply require an "expressed consent" from the recipient in order for such messages to be generated. Stated simply, if a consumer supplies the CU with their mobile number, they have by this action expressed a consent for the CU to communicate with them via this number. In no circumstance will a consumer be required to provide a cell number nor to participate in any form of texting.

- *Marketing*

Marketing-related text messages require the consumer's prior specific consent to receive such messages. Marketing-related text campaigns must be approved by the Marketing and Community Relations Manager or the President.

Message Disclaimers

Upon initial registration in the text system, consumers will receive the following welcome message:

This # is verified to rcv msgs from Autotruck FCU. # of msgs varies by acct/preference. Msg&Data rates may apply. To optout reply STOP, HELP for info.

All outgoing templated text messages will conclude with:

To optout reply STOP

Opt-Out

Autotruck shall provide any and all text recipients the means to opt-out of the receipt of text messages by replying with the word STOP. Vendor systems shall be utilized to ensure that all opt-out requests are immediately honored, preventing the member from receiving future text messages.

Member Service Consumers with questions or confusion regarding texting functionality may call Autotruck at 1-800-459-2328 during normal business hours for advisement.

Assignment of Responsibility

The board of directors assigns the President with responsibility for the credit union's adherence to this policy. The President shall identify appropriate vendor(s) to foster the compliant usage of this communication channel. The President shall also work with individual department managers as appropriate to 1) identify areas where the deployment of texting is appropriate and useful, 2) to ensure that texting options are limited to only those staff who have a need for this tool, 3) to ensure that procedures are deployed such as to promote compliance with any and all texting requirements and standards, and 4) to ensure that staff are appropriately trained in those requirements and standards.

Audit

At least annually, the compliance officer shall perform an audit to ensure that the credit union's policy, procedures, training, and actual usage of texting options remains in compliance with this policy and all applicable regulatory standards.