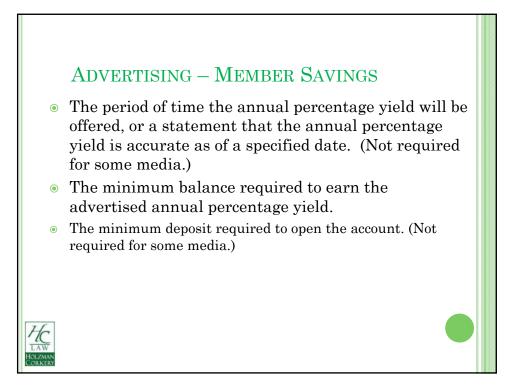
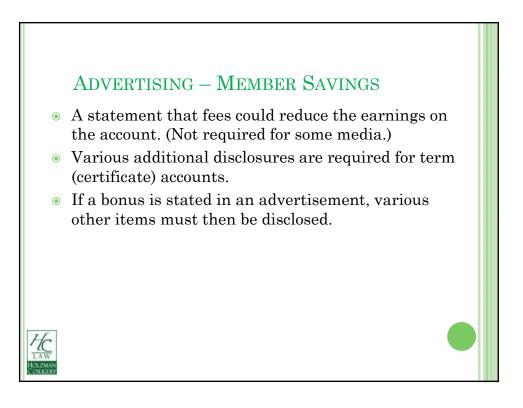


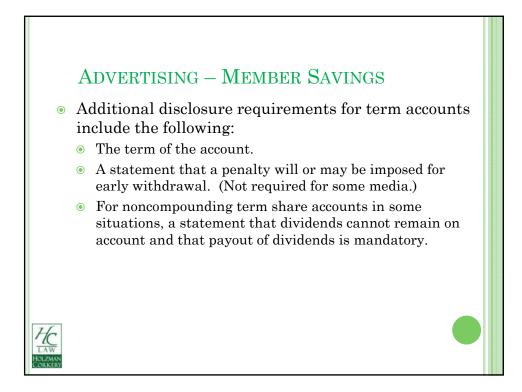
Advertising – Member Savings

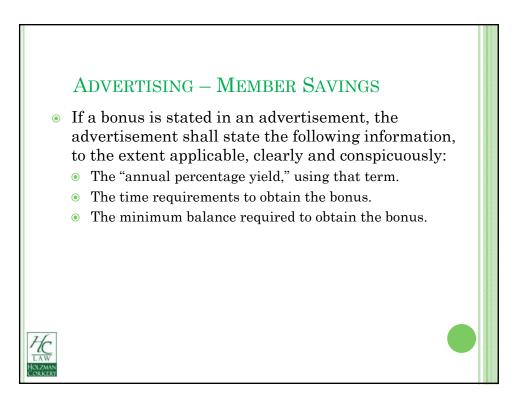
- If an advertisement states a rate of return, it shall state the rate as an "annual percentage yield," using that term. (The abbreviation "APY" may be used provided the term "annual percentage yield" is stated at least once in the advertisement.)
- The advertisement shall not state any other rate, except that the "dividend rate" or "interest rate" as applicable, using that term, may be stated in conjunction with, but not more conspicuously than, the annual percentage yield to which it relates.







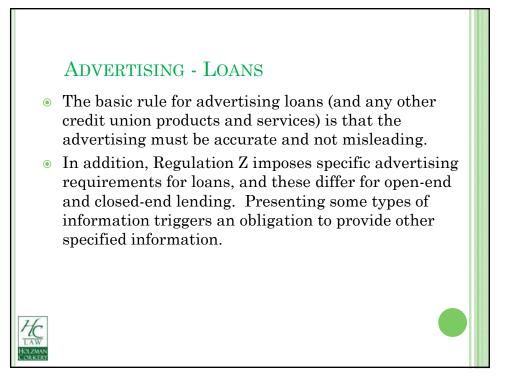


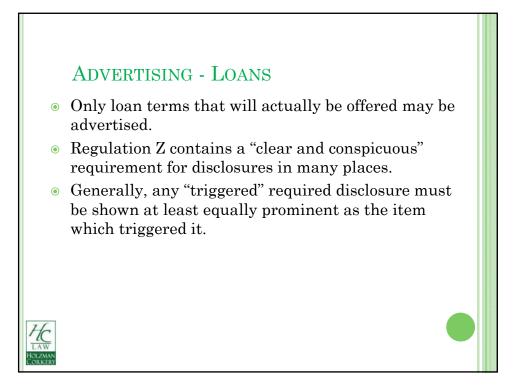


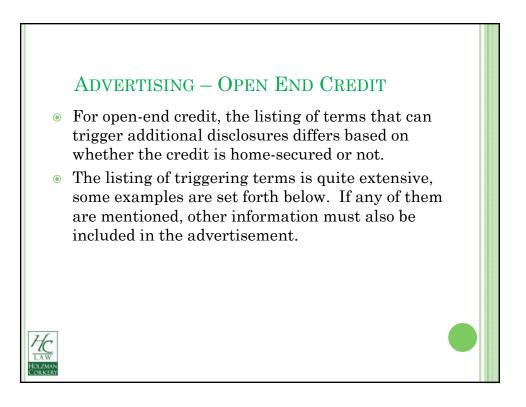
Advertising – Member Savings

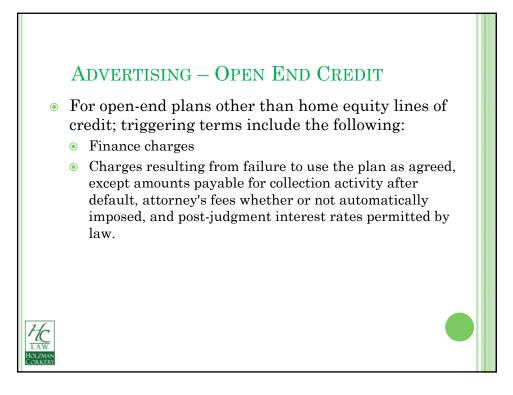
- The minimum balance required to open the account, if it is greater than the minimum balance necessary to obtain the bonus. (Not required for some media.)
- When the bonus will be provided. (Not required for some media.)
- Where we note "Not required for some media," the disclosure is not required in (i) Broadcast or electronic media, such as television or radio; (ii) Outdoor media, such as billboards; or (iii) Telephone

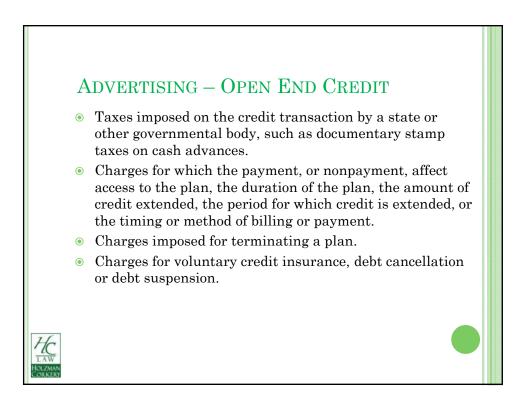
response machines.

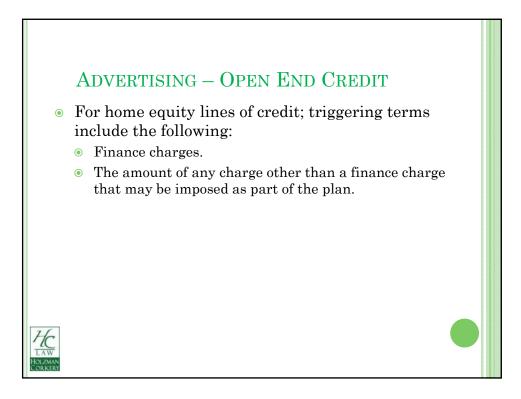


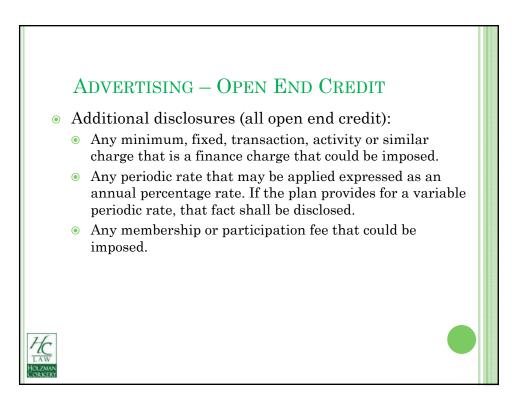






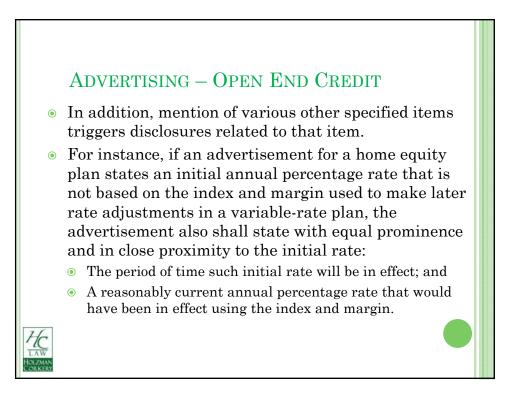


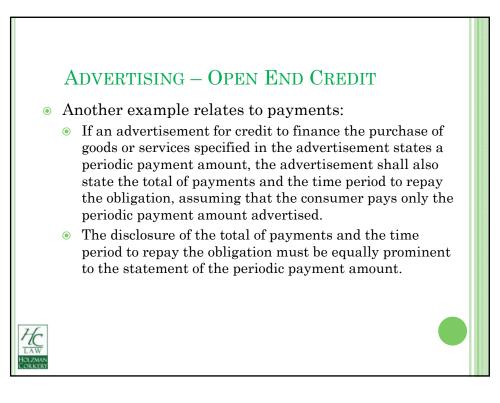


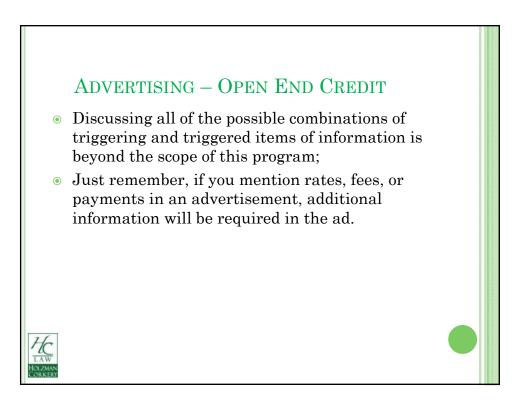


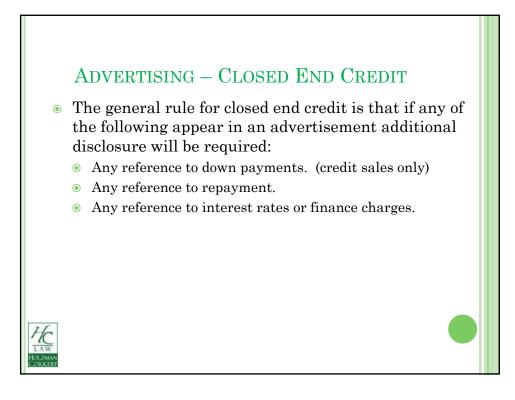


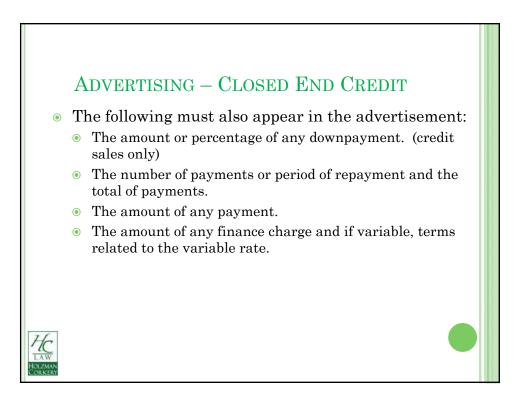
- And for home secured lines of credit plans, the following additional disclosures are required as well as those mentioned earlier:
 - Any loan fee that is a percentage of the credit limit under the plan and an estimate of any other fees imposed for opening the plan, stated as a single dollar amount or a reasonable range.
 - Any periodic rate used to compute the finance charge, expressed as an annual percentage rate.
 - The maximum annual percentage rate that may be imposed in a variable-rate plan.







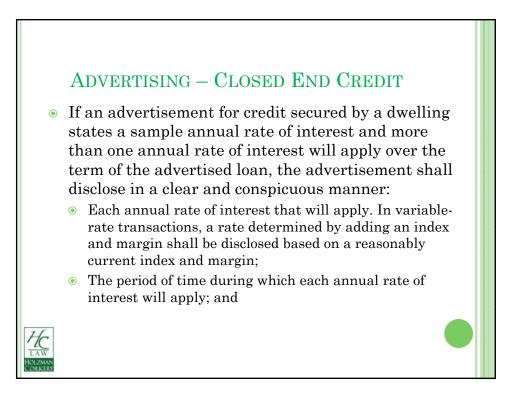




Advertising – Closed End Credit

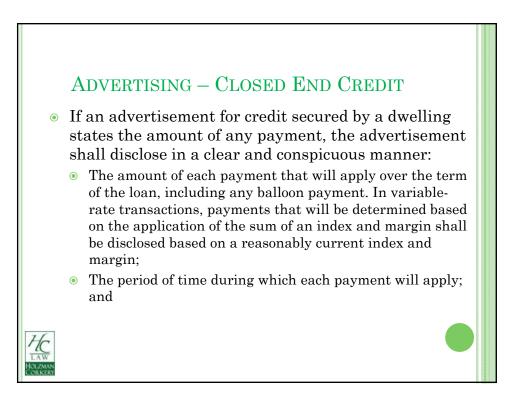
• An advertisement made through television or radio stating any of the terms requiring the additional disclosures listed in the previous slide may comply with that requirement either by:

- Stating clearly and conspicuously each of the additional required disclosures
- (a) Stating clearly and conspicuously the "annual percentage rate," using that term, and, if the rate may be increased after consummation, that fact and (b) listing a toll-free telephone number, or any telephone number that allows the caller to reverse the phone charges when calling for information, along with a reference that such number may be used by consumers to obtain additional cost information.



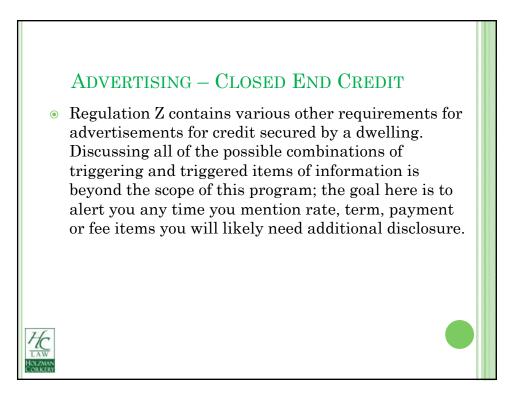


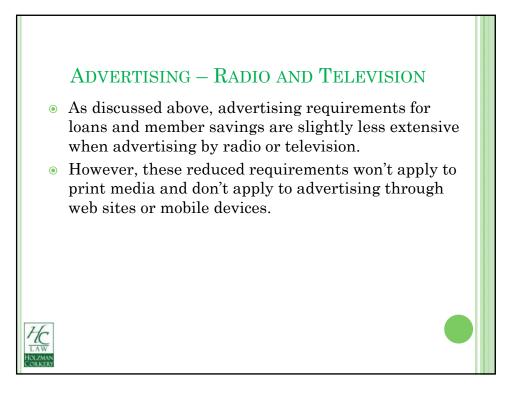
- Each annual percentage rate for the loan. If such rate is variable, the annual percentage rate shall comply with the accuracy standards which require the use of a rate that is currently available.
- "Clearly and conspicuously" disclosed means that the required information set forth above shall be disclosed with equal prominence and in close proximity to any advertised rate that triggered the required disclosures. The Annual Percentage Rate may be disclosed with greater prominence than the other information.





- In an advertisement for credit secured by a first lien on a dwelling, the fact that the payments do not include amounts for taxes and insurance premiums, if applicable, and that the actual payment obligation will be greater.
- A clear and conspicuous disclosure means that the required information in the first two paragraphs immediately above shall be disclosed with equal prominence and in close proximity to any advertised payment that triggered the required disclosures, and that the required information in the last paragraph immediately above shall be disclosed with prominence and in close proximity to the advertised payments.







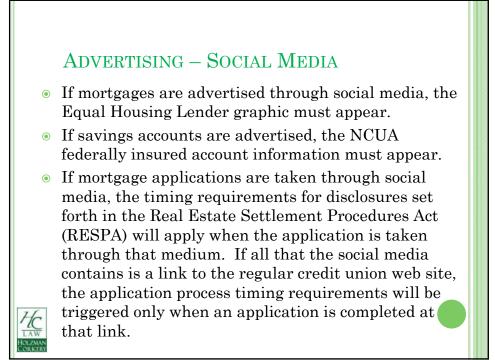
Advertising – Social Media

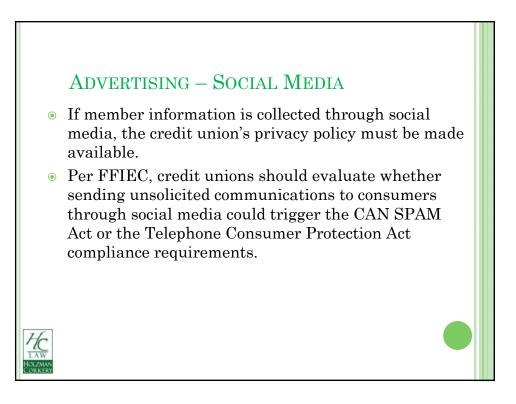
- FFIEC states that text messages and e-mail by themselves are not social media but they may still be subject to many of the laws and regulations contained in the guidance.
- FFIEC discusses risks associated with use of social media. These risks are not limited to legal and compliance risks; they also include reputational and operational risks.

Advertising – Social Media

- If social media may be used by members to actually apply for loans or savings accounts or enter into agreements, credit unions must make the appropriate disclosures and also be able to present their contracts through the media. The material discussed earlier with respect to advertising loans and savings would apply to advertisements through social media.
- If social media merely sets forth links to the credit union's web site and no triggering terms appear in the social media page, then credit unions may follow their normal procedures for web based services.







Advertising – Social Media

 The CAN SPAM Act and its implementing regulations establish requirements for sending unsolicited commercial messages ("spam") electronically either through social media or otherwise. Requirements for such messages include accurate routing information, an accurate subject line, labeling the message as an advertisement, providing an accurate postal address, and a process for recipients to opt-out of receiving such messages in the future.

The following FTC link provides some additional information: <u>http://www.ftc.gov/tips-advice/busines</u> <u>center/can-spam-act-compliance-guide-business</u>.

ADVERTISING – SOCIAL MEDIA The Telephone Consumer Protection Act and its implementing regulations establish requirements related to sending unsolicited communications by telephone or short message service (SMS) text message. This is the law that established the national "Do not call" registry and requires the credit union to maintain its own internal "Do not call registry." It also imposes additional requirements applicable to telemarketing calls. Additional Information can be found on the FCC web site at http://www.fcc.gov/encyclopedia/telemarketing.



- Information collected from children under the age of 13 through social media will trigger the Children's Online Privacy and Protection Act (COPPA).
- COPPA sets forth strict requirements that must be met before collecting information on line (through social media or otherwise) from children under the age of 13.
- The credit union needs to monitor whether it is actually collecting any information from someone under the age of 13.



