



## **MEMBER Identification Program (MIP) Notice**

To comply with financial regulators on proper member identification and verification of new account holders required under the USA PATRIOT Act, the counter-terror law. CFEFCU policy implements section 326 of the USA PATRIOT Act, which requires the regulators to issue rules requiring "reasonable procedures" for (1) verifying the identity of any person seeking to open an account; (2) maintaining records of the information used to verify the person's identity; and (3) determining whether the person appears on any government list of known or suspected terrorists or terrorist organizations.

This policy is enforced by the Treasury's Financial Crimes Enforcement Network and seven federal financial regulators, including NCUA, the FDIC, Federal Reserve Board, Office of the Comptroller of the Currency, Office of Thrift Supervision, Commodity Futures Trading Commission and the Securities and Exchange Commission. This program is aimed largely at money laundering and terrorist financing, the program offers members added protection against some kinds of fraud, such as identity theft.

### **Verifying Member Identification**

This policy requires anyone employed by the credit union opening an account, anyone being added as a signatory to an existing account, or is the cardholder of a prepaid card on an account (includes non-members) to provide a minimum amount of identifying information to the credit union. Such information includes but is not limited to:

- Name
- For individuals, date of birth
- For individuals, residential street address required, and if different for mailing purposes post office box
- For persons other than individuals a street address of the principal place of business or local office
- For persons other than individuals (such as a corporation, partnership, or trust), documents showing the existence of the entity, such as certified articles of incorporation, a government issued business license, a partnership agreement, or trust instrument
- For U.S. persons, a taxpayer identification number such as a social security number, individual taxpayer identification number, or employer identification number along with an unexpired government issued identification bearing a photograph or similar safeguard such as a driver's license or a passport
- For non-U.S. persons, one or more of the following: a U.S. taxpayer identification number; passport number and country of issuance; alien identification card number; or number and country of issuance of any other government-issued document evidencing nationality or residence and bearing a photograph or similar safeguard.

### **Legal Entity Account (Customer Due Diligence)**

Effective May 11, 2018, Section 326 of the USA Patriot Act will require all financial institutions to obtain, verify, and record information that identifies each person who opens an account for a covered Legal Entity. New Rules under the Bank Secrecy Act will aid the government in the fight against crimes to evade financial measures designed to combat terrorism and other national security threats. Each time an account is opened for a covered Legal Entity, we are required to ask you for identifying information (name, address, date of birth, social security number and identification documents) for:

- Each individual that has beneficial ownership (25% or more) in the Legal Entity; and
- One individual that has significant managerial responsibility for the Legal Entity.