

## **FIPCO – ATM Access Privacy Policy**

Financial Institution Products Corporation (“FIPCO”) manages the ATM Access program for financial institutions and their customers providing them with surcharge free access to ATMs located in Wisconsin and Minnesota.

Financial institutions that are involved in the ATM Access program must be members in good standing with the Wisconsin Bankers Association and execute a Participation Agreement with FIPCO. As part of the enrollment process, FIPCO collects BIN network routing information and Geo Location information from financial institutions in order to actively participate in the program. None of the information collected in this process is personally identifiable information as defined by federal law; however, FIPCO retains such information in a commercially reasonable confidential manner. This information is only communicated to applicable service providers for the purposes of enrolling a specific ATM terminal in the program and Program Participants to allow for the surcharge free functionality to operate when customers are using terminals enrolled in the program.

FIPCO has also developed an ATM Access app that allows customers to locate participating machines more easily in the ATM Access program from any device. The ATM Access App does not collect in any manner personally identifiable information as defined by federal law. The ATM Access App does collect the location of the device an individual is using to open the app using the device location service function, and further uses Google Map technology to locate participating ATMs in the vicinity of the user to display those locations to the user.

At this time, when using Maps JavaScript API, the following information is sent to Google which FIPCO does not control: map size and location for retrieving map tiles and copyrights; addresses for geocoding; direction and elevation requests; locations around which to search for places; and, KML when using KmlLayer. None of the location data of either the device owner or the ATM machines is stored in any way on the app, nor shared with any third party other than with Google as described above. Google also has the ability to store information on a user’s device in the form of a cookie and while Google does not currently do this, it is something FIPCO does not control. Users can directly remove cookies from their own personal devices (i.e. “Clear Cookies”). Once the user closes the app, the location data collected is erased.

Questions related to FIPCO’s ATM Access Privacy Policy can be submitted to FIPCO via email at: [fipcosales@fipco.com](mailto:fipcosales@fipco.com) or by phone at 1-800-722-3498 #274.

*Effective March 15, 2019*