

NEBRASKA INVESTMENT FINANCE AUTHORITY PRIVACY POLICY

Section 1. Confidentiality

NIFA is an instrumentality of the State of Nebraska, and as such, NIFA is entrusted to operate numerous public purpose programs for the citizens of the State. During the course of your employment, you may become privy to certain private and confidential information. Any unauthorized use of such information by you is grounds for termination of your employment.

Employees are not entitled to release information about NIFA, its employees, or NIFA activities to the media or to others unless specifically authorized to do so by the Executive Director. Speeches may not be made or papers published about NIFA's activities without authorization by the Executive Director.

Employees are exposed daily to a great deal of confidential information. None of this information shall be repeated or discussed with relatives or friends outside NIFA. It also should only be discussed with other employees as necessary to the processing and transacting of daily business.

Discussing confidential information displays poor judgment and undermines the confidence NIFA has placed in an employee. The ability to keep confidential information is one of the criteria by which an employee is measured when opportunities for advancement are considered. Circumstances may warrant appropriate disciplinary action, which could include immediate discharge.

Each employee shall abide by the terms and conditions of this Privacy Policy.

Section 2. Commitment to Privacy

NIFA recognizes that it has a responsibility to protect the financial and personal information that is entrusted to it in connection with its activities ("nonpublic information") and takes that responsibility very seriously. It is important for employees of NIFA to be aware that NIFA has taken affirmative steps, such as this Privacy Policy, to protect nonpublic information from accidental or unauthorized disclosure, modification or destruction, as well as to assure the security, reliability, integrity and availability of such information.

Section 3. Information NIFA Collects

NIFA collects and uses various types of nonpublic information to carry out its business activities and better understand the needs of its constituents. Sources of nonpublic information include (but are not limited to):

- (a) applications, forms and other information that parties provide to NIFA, in writing, in person, by telephone, electronically or by any other means, such as name, address, social security number (as well as other employment information), income and credit references;
- (b) financial information from consumer credit reporting agencies, such as account balances and payment history; and
- (c) transaction and account experiences that parties have with NIFA and others, such as account balances, payment history and account usage with a particular institution.

If you are unsure if something is nonpublic information, talk with your supervisor.

Section 4. NIFA Security Procedures

NIFA maintains physical, electronic, and procedural safeguards to protect the confidentiality and integrity of nonpublic information.

Access to nonpublic information is restricted to NIFA employees. NIFA continually updates its security standards and procedures to help protect against anyone gaining unauthorized access to nonpublic information, including through the Internet.

NIFA and its employees work hard to ensure that the nonpublic information that NIFA collects and maintains is complete and accurate. NIFA has procedures and processes for updating any information as well as removing old information — changes may only be made in authorized and acceptable ways. NIFA also protects the integrity of nonpublic information through such measures as (but not limited to):

- (a) maintaining backup copies of account data in the event of power outages or other business interruptions;
- (b) using computer virus detection and eradication software on systems containing nonpublic information;
- (c) installing computer hardware and software and employing other technical means (known as "firewalls") to prevent unauthorized computer entry into systems containing nonpublic information;
- (d) for online systems, employing standard encrypted secure site access (https) coupled with unique usernames and passwords; and
- (e) terminating user access once the user is no longer authorized to access nonpublic information.

If NIFA becomes aware of inaccuracies in its records, NIFA will take prompt steps to make appropriate corrections.

Section 5. NIFA Employees

All NIFA employees have access to information, including nonpublic information, applicable to their job responsibilities. Therefore, all NIFA employees play a vital role in protecting the confidentiality and integrity of nonpublic information that NIFA collects and uses. All NIFA employees are required to abide by the provisions of this Privacy Policy with respect to the protection of information.

Department managers must approve requests for access to information relevant to their programs and determine how the information will be shared with the requesting party.

Section 6. Sharing Nonpublic Information

NIFA may disclose nonpublic personal information to appropriate third parties, including financial service providers, for specific purposes in connection with carrying out NIFA business. NIFA restricts the information that NIFA provides to third parties to information that they may need to perform their service.

NIFA is also required by law, in certain instances, to disclose nonpublic personal information to nonaffiliated third parties. For example, NIFA may be required to share nonpublic information to respond to a subpoena or court order, quasi-judicial process or regulatory authorities; to report account activity to credit bureaus or to provide information to protect against fraud.

NIFA does not sell nonpublic information for any purpose.

Section 7. Enforcement of Privacy Policy

All NIFA employees are governed by the NIFA Code of Conduct and Ethics that includes the responsibility to protect the confidentiality of nonpublic information. NIFA employees are bound by this Privacy Policy and are educated on implementing NIFA's security principles and practices. Should any employee be found in violation of this Privacy Policy, NIFA will take such measures as deemed prudent.