

Limitation of Services Policy

General Policy Statement:

It is the policy of Western New York Federal Credit Union (Credit Union) to deny basic financial services and access to Credit Union facilities or events for reasons related to: (1) a member's abusive or threatening behavior to employees; (2) causing the Credit Union a loss or frivolous expense; (3) intentionally or otherwise perpetrating real or potential fraud on the Credit Union; or (4) any other reason that poses a safety or soundness threat to the Credit Union. A member may be denied any and all services offered by the Credit Union and such services may be terminated upon notification of the member. The member may be denied access to any Credit Union facility or event upon written or oral notice to them. A member will retain the right to have a savings (share) account and the right to vote at all annual and special meetings.

Guidelines:

1. DENIAL FOR LOSS TO THE CREDIT UNION

A. **What Constitutes a Loss.** This list is non-exhaustive and is used only as an example of types of behavior that may be deemed as "losses" under this policy.

- i. Delinquency on a loan obligation
- ii. Chargeoff or other unpaid collection items
- iii. Filing Bankruptcy
- iv. Abusing Overdraft Privileges
- v. Perpetuating Fraud
- vi. Check
- vii. Wire
- viii. Identity
- ix. Online
- x. ATM/Debit Card
- xi. Credit Card
- xii. Being Convicted of Financial Crimes

B. **Services that may be Denied.** All services may be denied; except the right to have a savings account and the right to vote in annual and special meetings, including but not limited to:

- i. ATM and debit cards
- ii. Borrowing Privileges
- iii. Checking Accounts
- iv. Check cashing privileges (excluding on-us items)
- v. Direct Deposit
- vi. Official Check Services
- vii. Internet Banking
- viii. ACH transactions
- ix. Wire transfers
- x. Club accounts
- xi. Payroll Deduction
- xii. Dividends
- xiii. Joint Membership

C. **Notification of Denial of Services.** Any denial of services must be approved by Management. The Credit Union will notify the member in writing or verbally of the denial of services and the reason(s) upon which the denial is based. If petitioned, the Credit Union will allow a member to request a reinstatement of services.

- i. Members may be approved for a waiver of the Denial of Services policy by Management if they have caused a loss but are working to reaffirm their debt obligations.

D. **Reinstatement & Appeal.** A member seeking reinstatement of services must notify Management, or designee, in writing of the reasons for their request. Such a request may, at the discretion of Management, be supplemented by testimony either in person or in writing.

- i. Management will respond to the member request within one week of receiving the appeal.
- ii. This response may be received orally or in writing.
- iii. In the event that the member is not satisfied with Management's decision, they may request a final review by the Board of Directors (Board).

- iv. Decisions made by the Board will be final and will be recorded in the Credit Union's records.

2. DENIAL FOR ABUSIVE AND THREATENING BEHAVIOR

A. **Abusive Conduct.** Including but not limited to:

- i. Making false, vicious or malicious statements verbally or in writing about the Credit Union or any employee, manager, or Board member
- ii. Using profane, abusive, intimidating, or threatening language verbally or in writing in any form of media toward the Credit Union or any employee, manager, Board member, or fellow member
- iii. Attempting to coerce or interfere with Credit Union employees in the performance of their duties at any time
- iv. Conducting or attempting to conduct or engage in any fraudulent, dishonest, or deceptive activity of any kind involving Credit Union employees or services
- v. Attempting to interfere in any way with Credit Union delivery of services or information to its members
- vi. Any posting, defacing, or removing notices or signs on Credit Union premises or on the Credit Union website
- vii. Writing on Credit Union bulletin boards without management authorization
- viii. Appropriations or misappropriation of Credit Union funds, property, or other material proprietary to Credit Union
- ix. Immoral conduct or indecency on Credit Union premises
- x. Deliberate or repeated violations of security procedures or safety rules
- xi. Possession, use or being under the influence of drugs or alcoholic substances on Credit Union premises
- xii. Fighting or possession of weapons of any kind on Credit Union premises
- xiii. Threatening the safety of employees or members, directly or indirectly through inappropriate or criminal behaviors
- xiv. Lewd, vulgar, or offensive language

xv. Unwanted advances

B. Response to Abusive Conduct. Including but not limited to:

- i. Denying services (such as those mentioned above)
- ii. Physical removal from Credit Union premises
- iii. Restricting the member from using the lobby on Credit Union premises
- iv. Restricting the member from using the drive-thru on Credit Union premises
- v. Contacting law enforcement

3. **NOTIFICATION TO MEMBERS OF DENIAL OF SERVICE POLICY.** The Credit Union shall notify all members of the Denial of Services Policy by providing the Policy on the Credit Union website as providing a copy of the Policy to members upon request.