Privacy Controls

Controlling Access to Member Accounts

INTRODUCTION

More and more, credit unions have become concerned about securing members' personal data – as well as the access to that information. CU*BASE Privacy Controls allow credit unions to heighten the controls place on this data, through masking, as well as requiring the entry of information to access member accounts.

CONTENTS

Revision date: November 30, 2017

For an updated copy of this booklet, check out the Reference Materials page of our website:
http://www.cuanswers.com/client_reference.php

What are Privacy Controls?

In a nutshell, Privacy Controls allows credit union control over who sees members' personal data in Teller, Phone Operator and Inquiry screens. A credit union might decide, for example, to use Privacy Controls configuration to mask all but the last four digits of the member's social security number. When this configuration is in place, an outside person assisting one of their members will see asterisks in place of the social security number (***-**-1234).

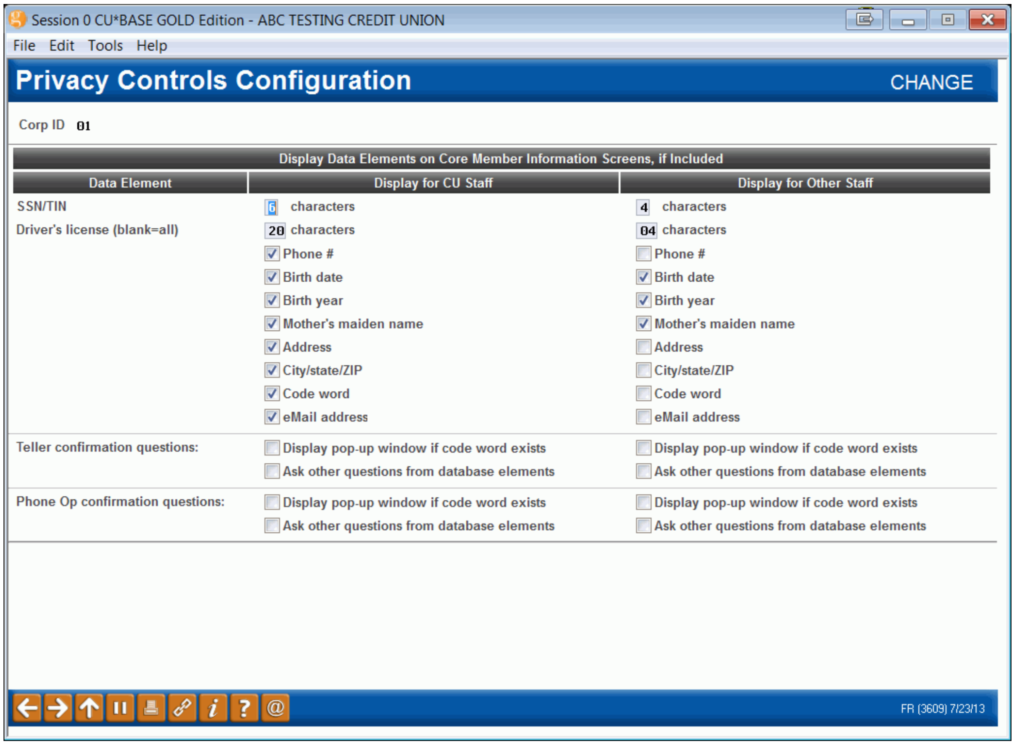
Privacy Controls also allows the credit union to require that a code word is entered or out-of-wallet question be answered to access a member's account. This ensures that when an outside person assists the member, they will be required to ask for this information.

Privacy Controls configuration has separate configurations for internal staff versus outside people who might assist members. Because of this, credit unions can even use Privacy Controls on their own staff members to ensure that authentication practices are followed internally as well. For example, credit unions can use this feature to ensure that their own staff always asks for a member's code word before entering the member's account.

Privacy Controls Configuration

Privacy Control Configuration Screen

Configure Privacy Controls **(Tool #272)**



Privacy Controls Configuration

Corp ID 01

Display Data Elements on Core Member Information Screens, if Included		
Data Element	**Display for CU Staff**	**Display for Other Staff**
SSN/TIN	6 characters	4 characters
Driver's license (blank=all)	20 characters	04 characters
	☑ Phone #	☐ Phone #
	☑ Birth date	☑ Birth date
	☑ Birth year	☑ Birth year
	☑ Mother's maiden name	☑ Mother's maiden name
	☑ Address	☐ Address
	☑ City/state/ZIP	☐ City/state/ZIP
	☑ Code word	☐ Code word
	☑ eMail address	☐ eMail address
Teller confirmation questions:	☐ Display pop-up window if code word exists	☐ Display pop-up window if code word exists
	☐ Ask other questions from database elements	☐ Ask other questions from database elements
Phone Op confirmation questions:	☐ Display pop-up window if code word exists	☐ Display pop-up window if code word exists
	☐ Ask other questions from database elements	☐ Ask other questions from database elements

The screen allows credit unions to differentiate between what will be visible to their credit union employees (*Display for CU Staff*) versus what shared branching tellers or Xtend call center staff see (*Display for Other Staff*).

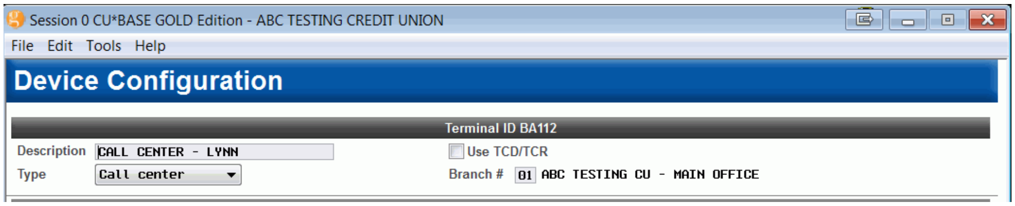
Using the top section of the screen, credit union can decide to mask private information they deem important. For example, a credit union may choose to mask all but the last 4 digits of a member's SSN/TIN whenever the Teller, Phone Operator, Inquiry, or Closed Inquiry screens are used by someone other than their own staff.

The bottom section of the screen determines which individuals are required to enter the member's code word and/or answer an out-of-wallet question to access a member's account via Phone Operator, Teller or both.

What determines if a person is considered "Other Staff"

A person is considered *Other Staff* when:

- The person enters your shared branching ID on the Teller posting screen
- The person does not have a workstation configured for your credit union
- The person has a workstation configuration with a Type of C=Call Center



Device Configuration

Terminal ID BA112

Description CALL CENTER - LYNN

☐ Use TCD/TCR

Type Call center

Branch # 01 ABC TESTING CU - MAIN OFFICE

How Does this Affect Call Centers and Working with Client Services?

Call Centers will be considered "Other Staff" and will have the restrictions place on the configurations for this setting because they will have a workstation configuration *Type* of *Call Center*. Client Service Representatives may also be restricted, depending on their configuration.

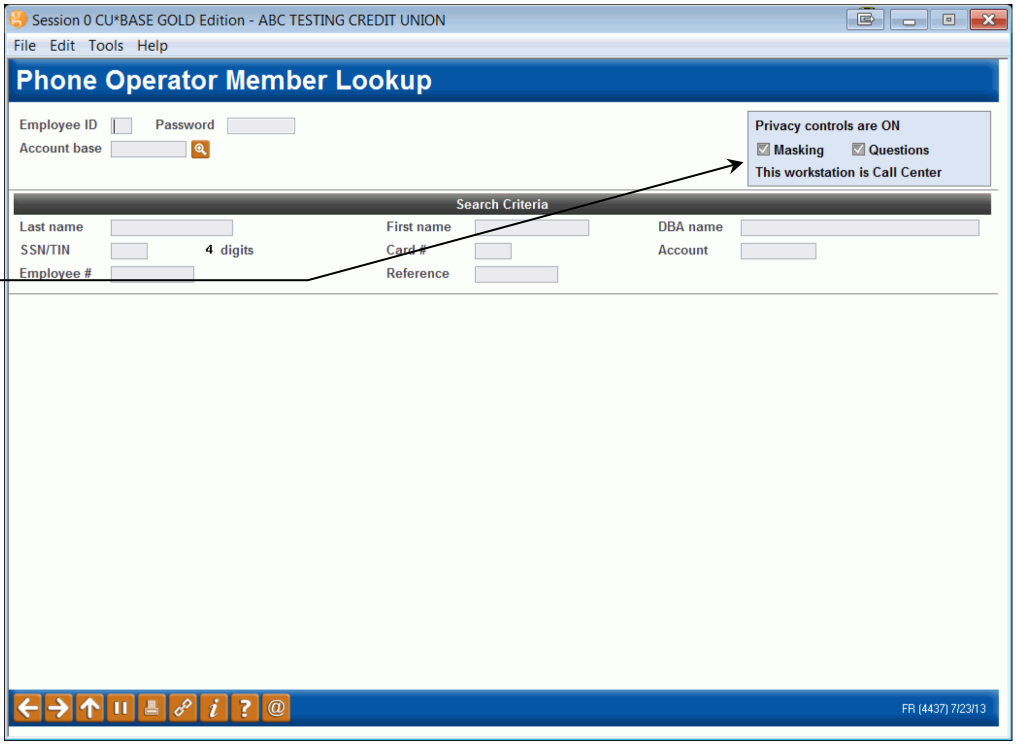
Special Restrictions Placed on "Other Staff"

Restrictions are placed on people accessing your accounts based on whether they are considered *CU Staff* or *Other Staff*.

- If a person is defined as an *Other Staff*, this person will not have access to certain function key and buttons, such as the Household Statistics button on Verify ID, Teller and Phone Operator screens, since this gives access to personal information that is not subject to the Privacy Controls configuration.

How to Determine that Privacy Controls are "On" for a User

When a user is configured to have Privacy Controls activated, the user will be notified of this condition when he or she accesses Inquiry, Phone Operator and Teller. If access is restricted a conditional badge will appear on the entry screen.



Phone Operator Member Lookup

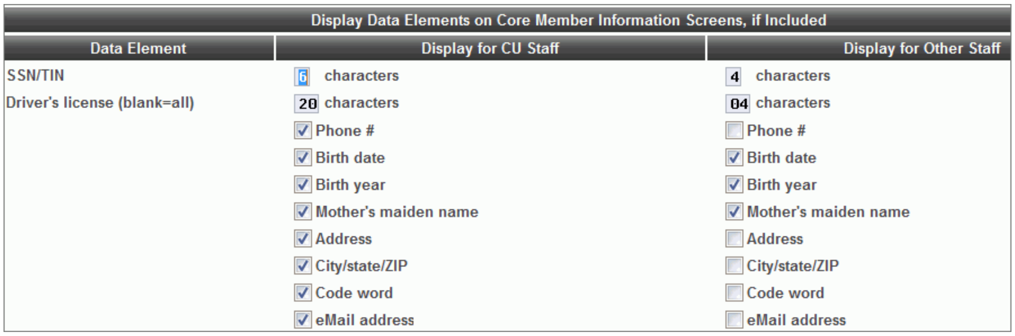
Privacy controls are ON
☑ Masking ☑ Questions
This workstation is Call Center

SSN/TIN 4 digits

This user is configured to has Privacy Controls turned on. *Masking* indicates that items will be masked on the Inquiry, Teller and Phone Operator screens. *Questions* indicates that either Code Word or Security Questions (or both) will be required for entry.

MASKING DATA USING PRIVACY CONTROLS

Using the Privacy Controls configuration, credit unions can select to mask private data on selected screens. If configured to be masked, the selected items will appear as asterisks when the person (according to role) accesses screens via Inquiry, Phone Operator or Teller.



Display Data Elements on Core Member Information Screens, if Included

Data Element	Display for CU Staff	Display for Other Staff
SSN/TIN	6 characters	4 characters
Driver's license (blank=all)	20 characters	04 characters
	☑ Phone #	□ Phone #
	☑ Birth date	☑ Birth date
	☑ Birth year	☑ Birth year
	☑ Mother's maiden name	☑ Mother's maiden name
	☑ Address	□ Address
	☑ City/state/ZIP	□ City/state/ZIP
	☑ Code word	□ Code word
	☑ eMail address	□ eMail address

Items that can be masked are shown above and include the following:

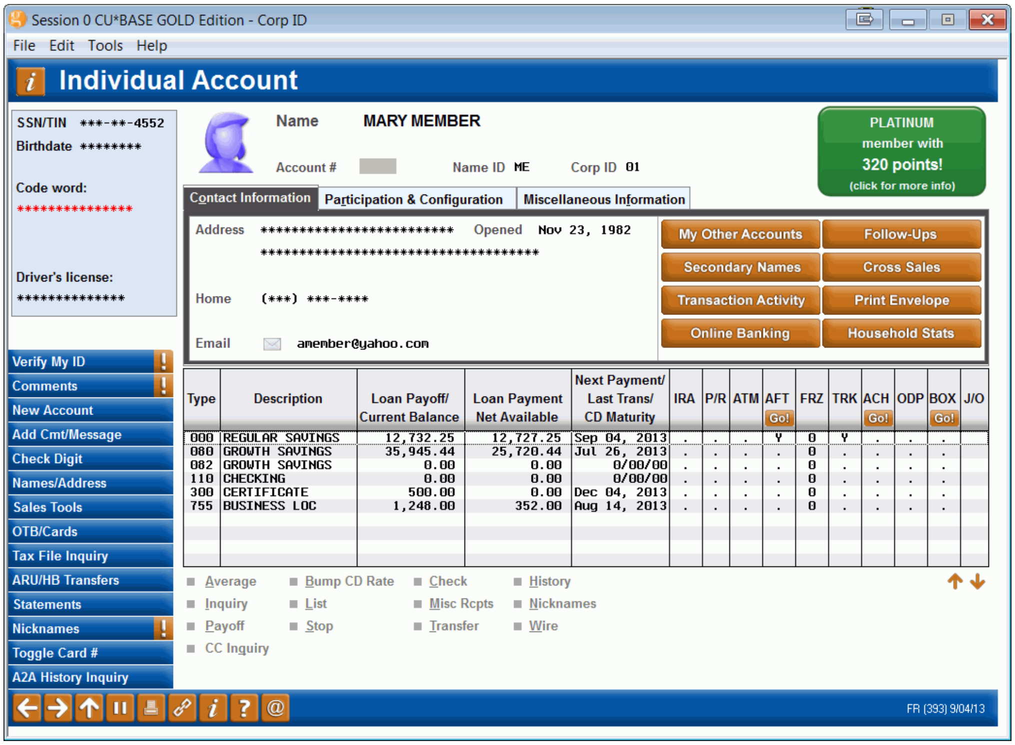
- Number of characters of SSN (to display)
- Number of characters of license number (to display)
- Phone #
- Birth date
- Birth year
- Mothers' maiden name
- Address*
- City/State/Zip
- Code word
- e-Mail address

Items that are *unchecked*, will show as asterisks. If you choose to mask certain digits in the social security number or driver's license, the masked numbers will show as asterisks (for example ***-**-1234 in place of a Social Security Number). If there is no data, such as no email address, the area will remain blank on the screen and no asterisks will appear, indicating that there is nothing to show on the screen.

*NOTE: If your credit union masks the Address line of the address, the Print Envelope button will not work on the Inquiry, Closed Inquiry, and Phone Operator screens, since this could give access to the address.

WHAT A PERSON ACCESSING THE ACCOUNT MIGHT SEE

Example of Phone Operator screen with everything but last two digits of SSN and last five of license number



Session 0 CU*BASE GOLD Edition - Corp ID

File Edit Tools Help

Individual Account

SSN/TIN ***-**-4552
Birthdate ********

Code word:
****

Driver's license:
****

Name MARY MEMBER

Account # [redacted] Name ID ME Corp ID 01

PLATINUM member with 320 points! (click for more info)

Contact Information | Participation & Configuration | Miscellaneous Information

Address ************************* Opened Nov 23, 1982
****

Home (***) ***-****

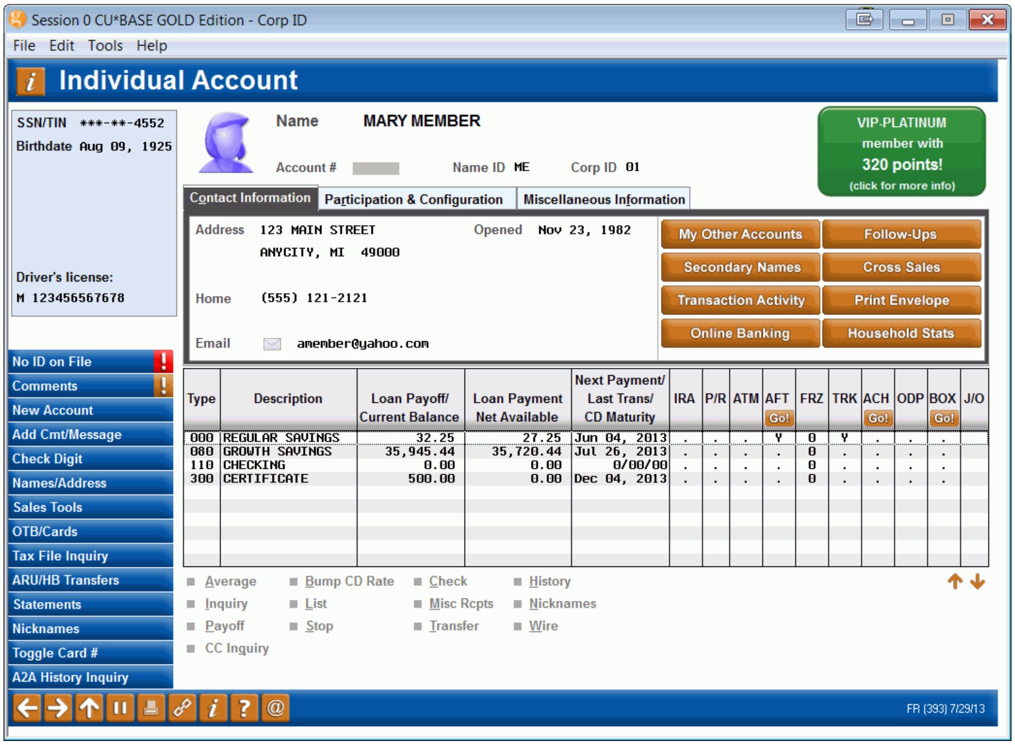
Email amember@yahoo.com

Type	Description	Loan Payoff/ Current Balance	Loan Payment Net Available	Next Payment/ Last Trans/ CD Maturity	IRA	P/R	ATM	AFT	FRZ	TRK	ACH	ODP	BOX	J/O
000	REGULAR SAVINGS	12,732.25	12,727.25	Sep 04, 2013	.	.	.	Y	0	Y	.	.	.	
080	GROWTH SAVINGS	35,945.44	25,720.44	Jul 26, 2013	.	.	.	.	0	.	.	.	.	
082	GROWTH SAVINGS	0.00	0.00	0/00/00	.	.	.	.	0	.	.	.	.	
110	CHECKING	0.00	0.00	0/00/00	.	.	.	.	0	.	.	.	.	
300	CERTIFICATE	500.00	0.00	Dec 04, 2013	.	.	.	.	0	.	.	.	.	
755	BUSINESS LOC	1,248.00	352.00	Aug 14, 2013	.	.	.	.	0	.	.	.	.	

FR (393) 9/04/13

In the example above, the person accessing the account was configured as *Other Staff*. Everything was masked by the credit union for this type of person, except for the last two digits of the social security number and the last five digits of the license number.

Example of same screen without masking (except last four of SSN)



Session 0 CU*BASE GOLD Edition - Corp ID

Individual Account

SSN/TIN ***-**-4552
Birthdate Aug 09, 1925

Driver's license:
M 123456567678

Name MARY MEMBER

Account # [redacted] Name ID ME Corp ID 01

VIP-PLATINUM member with 320 points! (click for more info)

Address 123 MAIN STREET
ANYCITY, MI 49000

Opened Nov 23, 1982

Home (555) 121-2121

Email amember@yahoo.com

Type	Description	Loan Payoff/ Current Balance	Loan Payment Net Available	Next Payment/ Last Trans/ CD Maturity	IRA	P/R	ATM	AFT	FRZ	TRK	ACH	ODP	BOX	J/O
000	REGULAR SAVINGS	32.25	27.25	Jun 04, 2013	.	.	.	Y	0	Y	.	.	.	
080	GROWTH SAVINGS	35,945.44	35,720.44	Jul 26, 2013	.	.	.	.	0	.	.	.	.	
110	CHECKING	0.00	0.00	0/00/00	.	.	.	.	0	.	.	.	.	
300	CERTIFICATE	500.00	0.00	Dec 04, 2013	.	.	.	.	0	.	.	.	.	

In the example above, the person accessing the account was configured as “CU Staff.” Nothing was masked except for the last four digits of the SSN.

CODE WORD

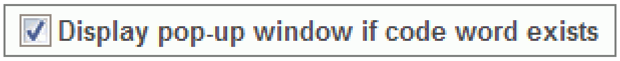
Members give the credit union a code word with the expectation that they will be asked for it prior to an employee accessing their account (especially when they are serviced on the phone since they are not present to provide identification).

Using Privacy Controls, a credit union can require that people categorized as “Other Staff” are required to enter the member’s code word in a pop-up screen before accessing the member’s account. Credit unions can also configure this setting for their own staff to ensure that they ask for it as well. If the code word pop-up screen appears and the code work is not entered correctly, the person will not be able to access the account.

- NOTE: The pop-up screen will not appear if the member does not have a code word for his or her membership.

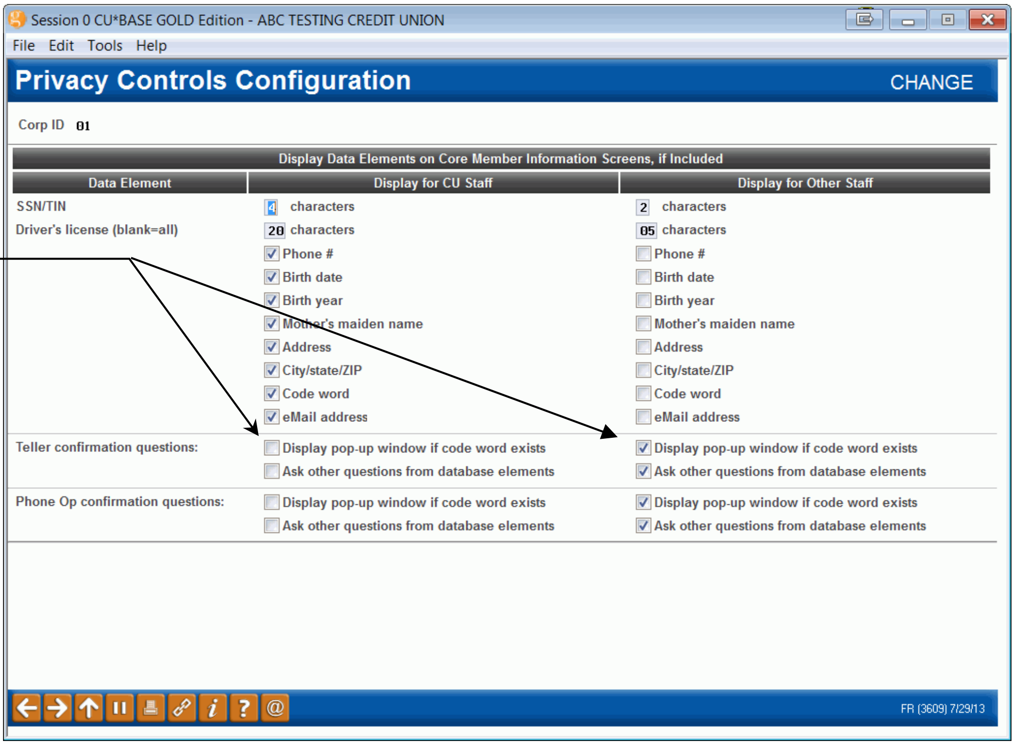
Separate controls allow credit unions to select that this feature be active in Teller or Phone Operator or both. This can be used in conjunction with Out-of-Wallet questions or not (see following section), depending on the credit union’s preference.

Code Word Configuration Control



☑ Display pop-up window if code word exists

Privacy Controls Screen



Privacy Controls Configuration CHANGE

Corp ID 01

Display Data Elements on Core Member Information Screens, if Included

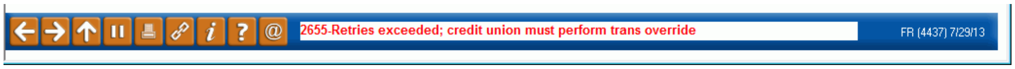
Data Element	Display for CU Staff	Display for Other Staff
SSN/TIN	4 characters	2 characters
Driver's license (blank=all)	20 characters	05 characters
	☑ Phone #	□ Phone #
	☑ Birth date	□ Birth date
	☑ Birth year	□ Birth year
	☑ Mother's maiden name	□ Mother's maiden name
	☑ Address	□ Address
	☑ City/state/ZIP	□ City/state/ZIP
	☑ Code word	□ Code word
	☑ eMail address	□ eMail address
Teller confirmation questions:	□ Display pop-up window if code word exists	☑ Display pop-up window if code word exists
	□ Ask other questions from database elements	☑ Ask other questions from database elements
Phone Op confirmation questions:	□ Display pop-up window if code word exists	☑ Display pop-up window if code word exists
	□ Ask other questions from database elements	☑ Ask other questions from database elements

Separate controls are available for *CU Staff* and *Other Staff*. There are separate Teller and Phone Operator, as well.

Rules for Access

If code word is activated, you will not be able to enter the account until you enter the correct code word. After three incorrect code entries, the account will lock and you will not be able to access the account until the lock is overridden by an employee using the Override feature at the *member* credit union.

Retries Exceeded

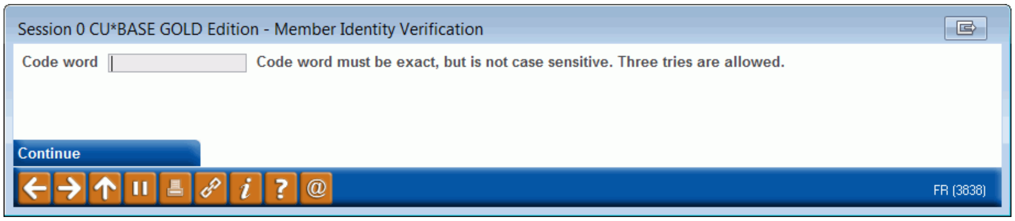


2655-Retries exceeded; credit union must perform trans override

What a Person Accessing the Account Might See

If a person accessing an account is required to enter the code word *and the member has one*, the person will be presented with the following screen:

Code Word Pop-Up Screen



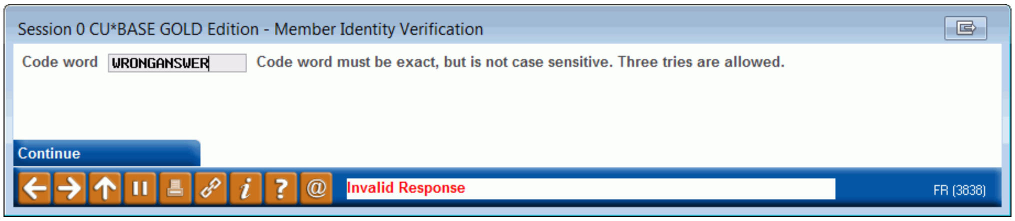
Session 0 CU*BASE GOLD Edition - Member Identity Verification

Code word Code word must be exact, but is not case sensitive. Three tries are allowed.

After entering the code word, the person uses *Continue* (F5) to enter the account. If the correct code word is entered, the person will either access the account (viewing the Verify Member screen and/or any other comment window first), or move on to the Out-of-Wallet question screens.

If an incorrect answer is entered, messaging will appear alerting the person of this condition.

Code Word Pop-Up Screen – Invalid Entry



Session 0 CU*BASE GOLD Edition - Member Identity Verification

Code word WRONGANSWER Code word must be exact, but is not case sensitive. Three tries are allowed.

Invalid Response

Out-of-Wallet Authentication

When a credit union activates Out-of-Wallet questions, the person accessing the account is required to correctly answer three questions (from data found in the MASTER file) before the person can access the account. Separate pop-up screens appear, each with a different question that must be answered.

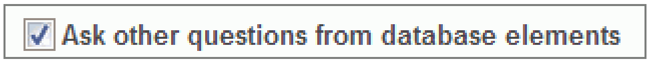
Questions for individuals include:

- Last four digits of SSN
- Birth date (mmddccyy)
- Phone number with area code (home, work, or other will work, as long as the number is a complete number with area code and all numbers are not the same)
- Zip code (first five digits only)
- Mother's maiden name (if exists on the system)

(For organizations the last four digits of the TIN, charter date, phone number with area code and zip code are used.)

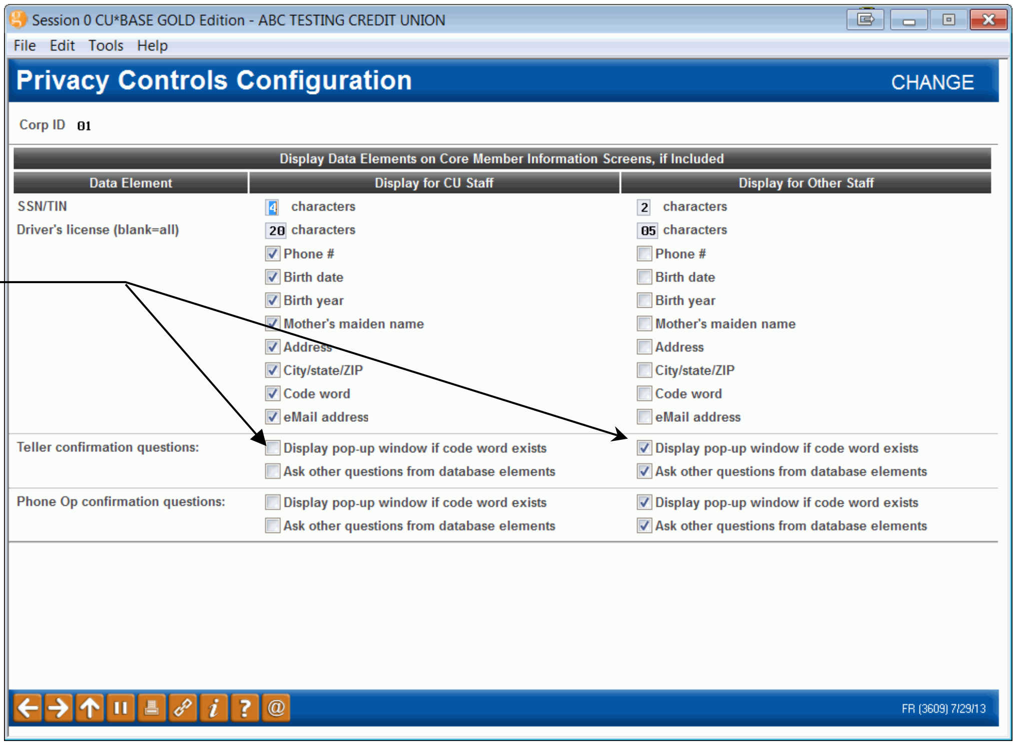
As with the code word configuration, separate controls allow credit unions to select that this feature be active for "CU Staff" or "Other Staff" (or both). Additionally, there are different configurations for Teller or Phone Operator. This can be used in conjunction with code word or not, depending on the credit union's preference.

Code Word Configuration Control



☑ Ask other questions from database elements

Privacy Controls Screen



Privacy Controls Configuration CHANGE

Corp ID 01

Display Data Elements on Core Member Information Screens, if Included

Data Element	Display for CU Staff	Display for Other Staff
SSN/TIN	4 characters	2 characters
Driver's license (blank=all)	20 characters	05 characters
	☑ Phone #	□ Phone #
	☑ Birth date	□ Birth date
	☑ Birth year	□ Birth year
	☑ Mother's maiden name	□ Mother's maiden name
	☑ Address	□ Address
	☑ City/state/ZIP	□ City/state/ZIP
	☑ Code word	□ Code word
	☑ eMail address	□ eMail address
Teller confirmation questions:	□ Display pop-up window if code word exists	☑ Display pop-up window if code word exists
	□ Ask other questions from database elements	☑ Ask other questions from database elements
Phone Op confirmation questions:	□ Display pop-up window if code word exists	☑ Display pop-up window if code word exists
	□ Ask other questions from database elements	☑ Ask other questions from database elements

Separate controls are available for *CU Staff* and *Other Staff*. There are separate Teller and Phone Operator, as well.

Rules for Access

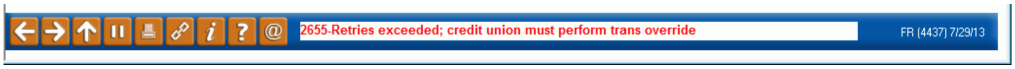
Two correct answers are required to advance to the account. If at least four answers exist in the database, you can use *Next Question* (F10) one time to advance to a second question. (This option can only be taken one time. Once selected, the *Next Question* button disappears from the next popup screen.)

Once an answer is typed, use *Continue* (F5) to advance to the next question (pressing Enter does nothing).

You can enter two incorrect answers; on the third wrong answer, the account is locked and the person will not be able to access the account until the lock is overridden by an employee using the Override feature at the *member* credit union.

- NOTE: Two incorrect answers for the same questions count as two wrong answers, for example if two wrong phone numbers are entered, that is considered two wrong entries.

Three Incorrect Entries



2655-Retries exceeded; credit union must perform trans override

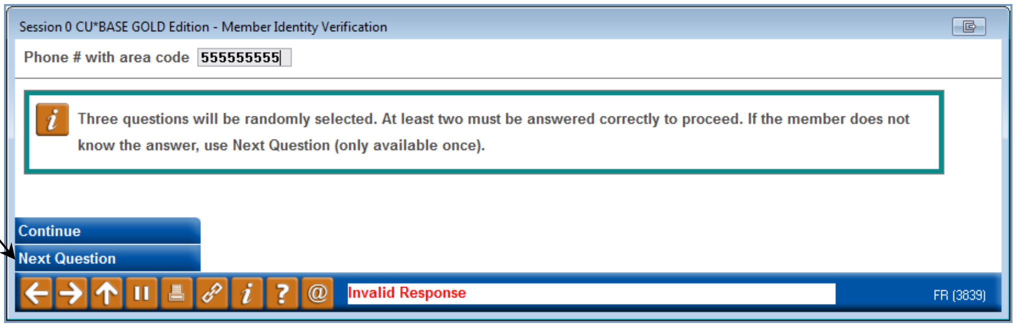
FR (4437) 7/29/13

What a Person Accessing the Account Might See

Here is an example of what a first Out-of-Wallet question might look like. (A list of possible questions is listed on the previous page.) This screen will either appear after the Code Word Pop-up screen (if this is activated), or directly after the person enters the account number (and Shared Branch ID if required).

If a correct answer is entered, the person entering the account may use F5-Continue to advance to the next question. After two correct answers, the person is able to access the account, after first viewing the Verify Member and/or any other comment screens.

Sample First Out-of-Wallet Question



Session 0 CU*BASE GOLD Edition - Member Identity Verification

Phone # with area code 555555555

Three questions will be randomly selected. At least two must be answered correctly to proceed. If the member does not know the answer, use Next Question (only available once).

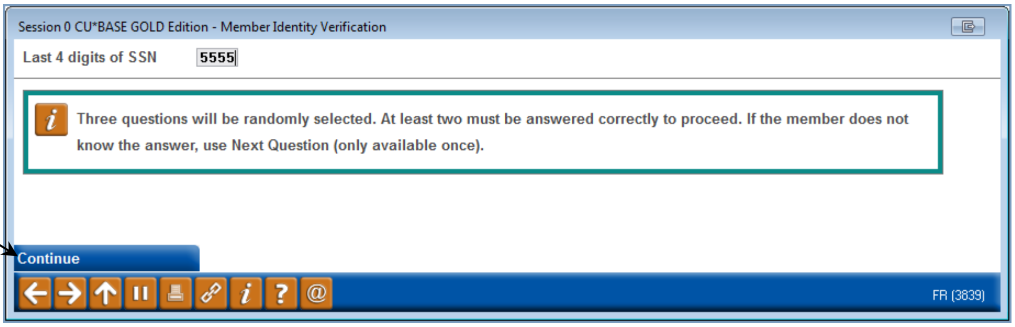
Invalid Response

FR (3839)

If there are at least four answers in the database, *Next Question* (F10) appears on the screen. You will be able to select this option one time.

If there are at least four answers in the database, *Next Question* (F10) appears on the screen. You will be able to select this option one time.

Sample Out-of-Wallet Question Once "Next Question" (F10) is Selected


Session 0 CU*BASE GOLD Edition - Member Identity Verification

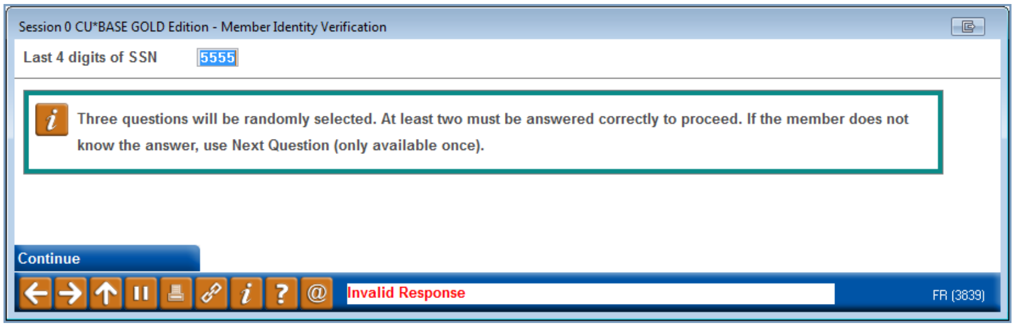
Last 4 digits of SSN 5555

Three questions will be randomly selected. At least two must be answered correctly to proceed. If the member does not know the answer, use Next Question (only available once).

Here we see that *Next Question* was selected. This button no longer appears.

If the wrong answer is entered and *Continue* (F5) is selected, messaging will appear showing that an invalid response was entered. This will be counted as one invalid response. (On the third invalid response, the account is locked.)

Sample Out-of-Wallet Question with Invalid Response


Session 0 CU*BASE GOLD Edition - Member Identity Verification

Last 4 digits of SSN 5555

Three questions will be randomly selected. At least two must be answered correctly to proceed. If the member does not know the answer, use Next Question (only available once).

Invalid Response

SECURITY CONTROLS

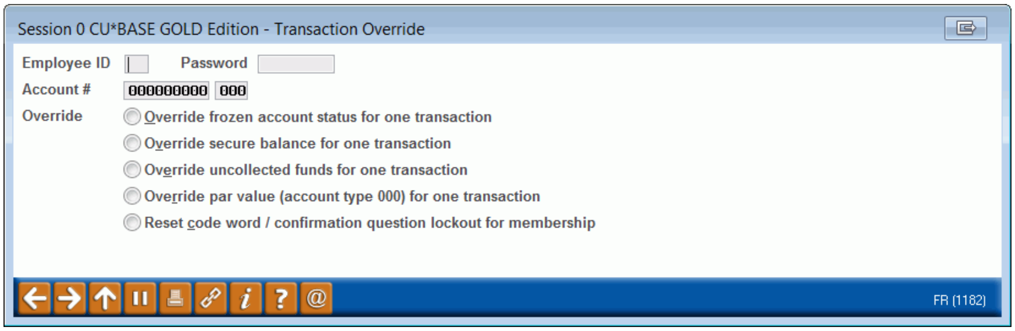
OVERRIDE OF LOCKED ACCOUNT

Once the account is locked (either by three invalid code word or out-of-wallet question answer), it cannot be accessed until the lock is overridden by an employee with override privileges at the *member* credit union.

The override feature can be accessed via F2-Trans Override on the Main Teller Posting, **Tool #585 *Perform Transaction Override***, or via *Supervisor transaction override* (7) on the Time Out Window.

All access points will bring you to the same screen:

Override Screen



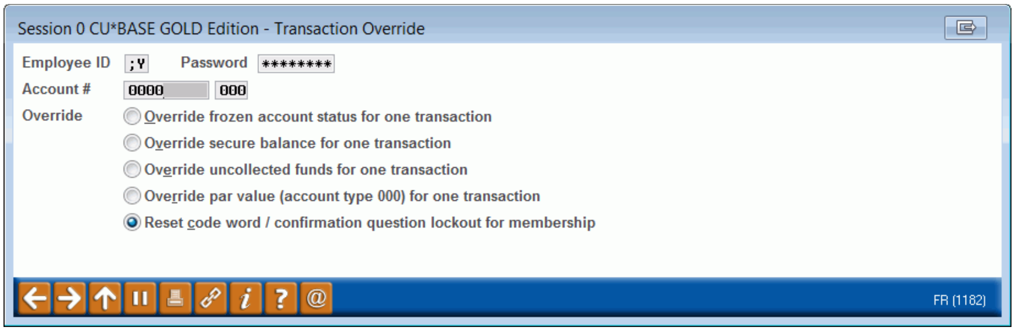
Session 0 CU*BASE GOLD Edition - Transaction Override

Employee ID Password

Account # 000000000 000

Override
○ Override frozen account status for one transaction
○ Override secure balance for one transaction
○ Override uncollected funds for one transaction
○ Override par value (account type 000) for one transaction
○ Reset code word / confirmation question lockout for membership

Enter your employee ID and password (if required) and the base account. Select *Reset code word / confirmation question lockout for membership* (5).



Session 0 CU*BASE GOLD Edition - Transaction Override

Employee ID ;Y Password ********

Account # 0000 000

Override
○ Override frozen account status for one transaction
○ Override secure balance for one transaction
○ Override uncollected funds for one transaction
○ Override par value (account type 000) for one transaction
● Reset code word / confirmation question lockout for membership

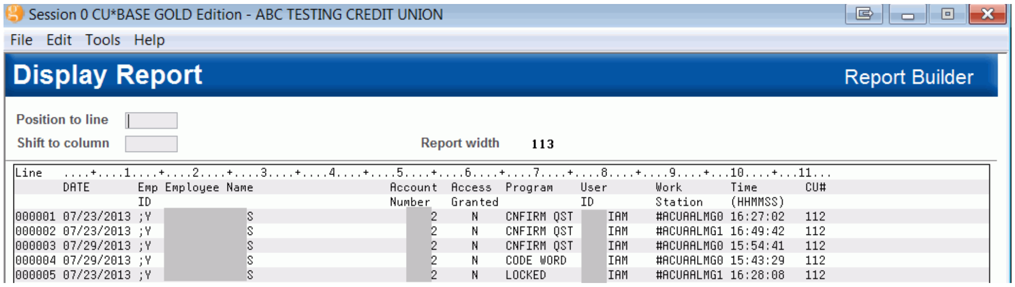
Press Enter to remove the lock on access to the selected account.

Reporting on Access to Accounts/Override of Locked Accounts

SECAUD File and Query

Each time a code word or out-of-wallet answer is entered, this entry is recorded in the SECAUD file. The Access Granted column shows if this entry resulted in access toward entering the account (Y) or in a locked account (N). A canned Query of this file can be access via **Tool #162 *Audit Insider/Employee Activity (SECAUD)***. Each entry (each code word and out-of-wallet answer) is recorded in a separate line in the file.

SECAUD File - Security Question and Code Word Access



Display Report

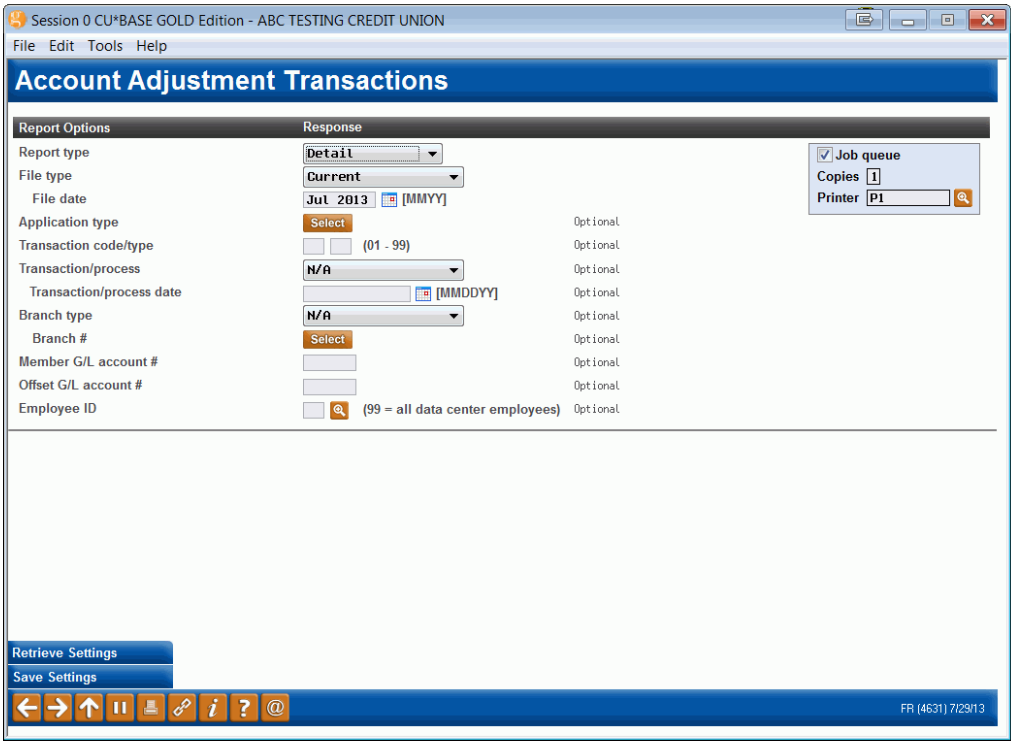
Position to line
Shift to column
Report width 113

```
Line    ....+....1....+....2....+....3....+....4....+....5....+....6....+....7....+....8....+....9....+...10....+...11...
        DATE        Emp Employee Name                             Account  Access  Program    User      Work       Time      CU#
                    ID                                            Number   Granted            ID        Station    (HHMMSS)
000001 07/23/2013 ;Y [redacted] S                          [redacted]2        N    CNFIRM QST [redacted] IAM  #ACUAALMG0 16:27:02  112
000002 07/23/2013 ;Y [redacted] S                          [redacted]2        N    CNFIRM QST [redacted] IAM  #ACUAALMG1 16:49:42  112
000003 07/29/2013 ;Y [redacted] S                          [redacted]2        N    CNFIRM QST [redacted] IAM  #ACUAALMG0 15:54:41  112
000004 07/29/2013 ;Y [redacted] S                          [redacted]2        N    CODE WORD  [redacted] IAM  #ACUAALMG0 15:43:29  112
000005 07/23/2013 ;Y [redacted] S                          [redacted]2        N    LOCKED     [redacted] IAM  #ACUAALMG1 16:28:08  112
```

Member Transaction Override Report

The Transaction Override Report allows you to review the number of times the lock on an account was overridden. Using the Code Word/Confirm Quest in the Override Type drop-down menu option will result in a report recording the overrides of this type.

Transaction Override Report (Tool #868)



Account Adjustment Transactions

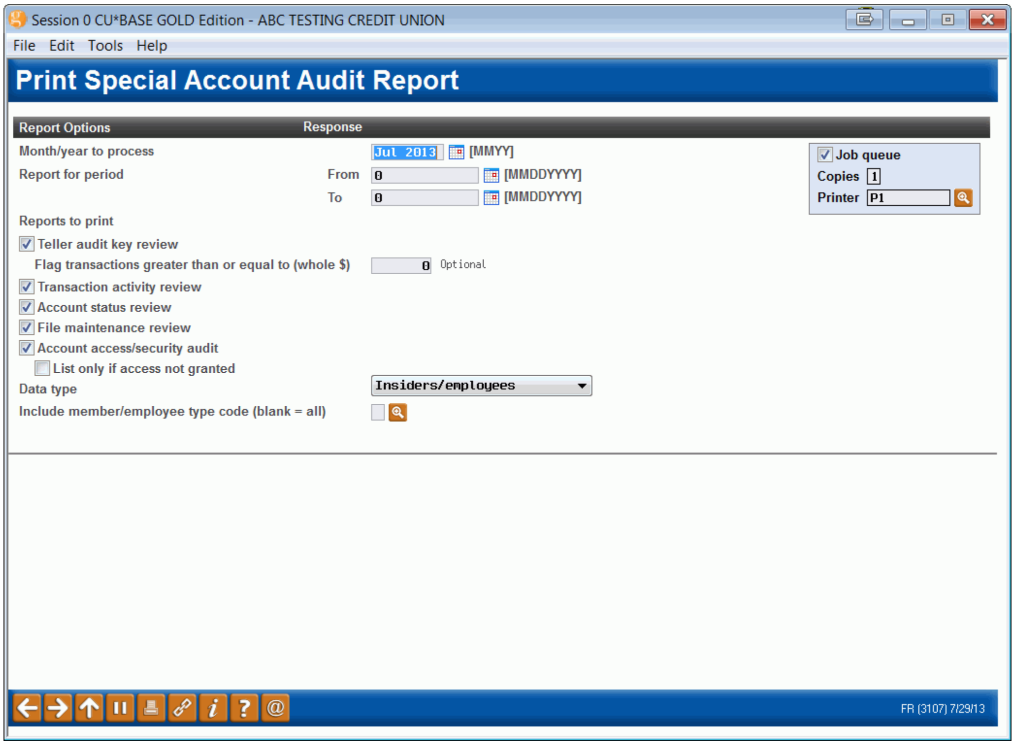
Report Options	Response	
Report type	Detail	
File type	Current	
File date	Jul 2013 [MMYY]	
Application type	Select	Optional
Transaction code/type	(01 - 99)	Optional
Transaction/process	N/A	Optional
Transaction/process date	[MMDDYY]	Optional
Branch type	N/A	Optional
Branch #	Select	Optional
Member G/L account #		Optional
Offset G/L account #		Optional
Employee ID	(99 = all data center employees)	Optional

☑ Job queue
Copies 1
Printer P1

Insider/Due Diligence Report

For reporting on Insiders, use the Account Security access/security audit selection on the Insider/Due Diligence Report. The report has two sections: one with each time a code word or out-of-wallet question was entered and one with the times that access was denied. If you check the “List only if access not granted” box, only the report that lists the times that access was denied will be printed.

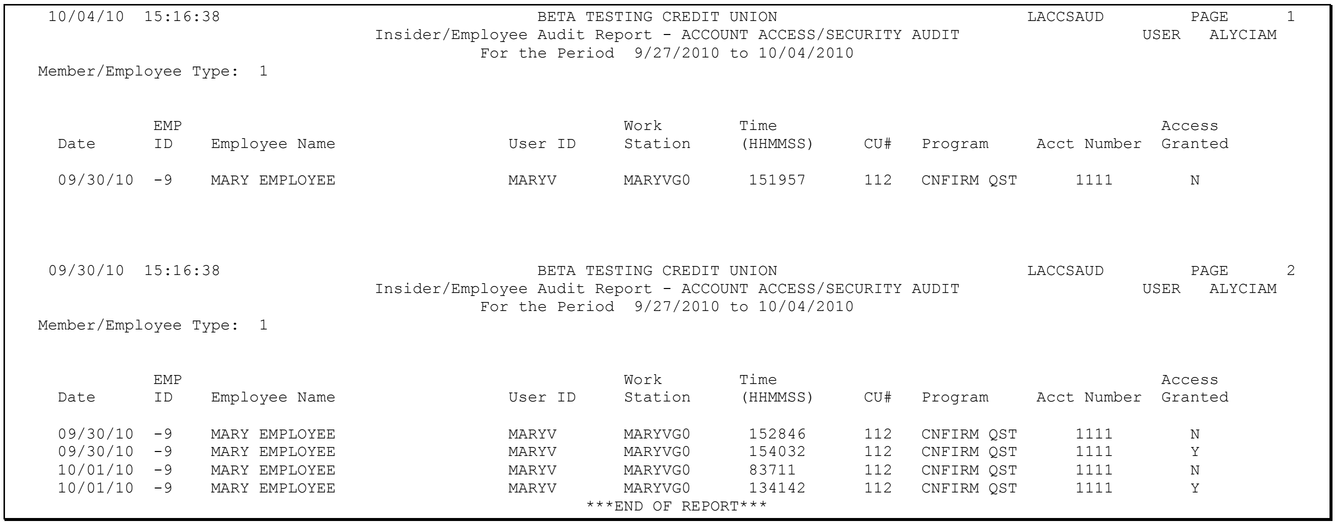
Insider Audit/Due Diligence Report **(Tool #402)**



Print Special Account Audit Report

Report Options		Response
Month/year to process		Jul 2013 [MMYY]
Report for period	From	0 [MMDDYYYY]
	To	0 [MMDDYYYY]
Reports to print		
☑ Teller audit key review		
Flag transactions greater than or equal to (whole $)		0 Optional
☑ Transaction activity review		
☑ Account status review		
☑ File maintenance review		
☑ Account access/security audit		
□ List only if access not granted		
Data type		Insiders/employees
Include member/employee type code (blank = all)		

☑ Job queue
Copies 1
Printer P1



```
  10/04/10   15:16:38                                   BETA TESTING CREDIT UNION                         LACCSAUD         PAGE      1
                                      Insider/Employee Audit Report - ACCOUNT ACCESS/SECURITY AUDIT                    USER    ALYCIAM
                                                 For the Period  9/27/2010 to 10/04/2010
 Member/Employee Type:   1


            EMP                                                Work         Time                                           Access
   Date      ID     Employee Name                  User ID     Station      (HHMMSS)     CU#    Program      Acct Number   Granted

   09/30/10  -9     MARY EMPLOYEE                  MARYV       MARYVG0       151957      112    CNFIRM QST       1111          N



  09/30/10   15:16:38                                   BETA TESTING CREDIT UNION                         LACCSAUD         PAGE      2
                                      Insider/Employee Audit Report - ACCOUNT ACCESS/SECURITY AUDIT                    USER    ALYCIAM
                                                 For the Period  9/27/2010 to 10/04/2010
 Member/Employee Type:   1


            EMP                                                Work         Time                                           Access
   Date      ID     Employee Name                  User ID     Station      (HHMMSS)     CU#    Program      Acct Number   Granted

   09/30/10  -9     MARY EMPLOYEE                  MARYV       MARYVG0       152846      112    CNFIRM QST       1111          N
   09/30/10  -9     MARY EMPLOYEE                  MARYV       MARYVG0       154032      112    CNFIRM QST       1111          Y
   10/01/10  -9     MARY EMPLOYEE                  MARYV       MARYVG0       83711       112    CNFIRM QST       1111          N
   10/01/10  -9     MARY EMPLOYEE                  MARYV       MARYVG0       134142      112    CNFIRM QST       1111          Y
                                                         ***END OF REPORT***
```

- The first page lists the accounts where access was denied. The second page lists all access attempts on the account.