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To: [privacyrfc2018](#)
Cc: lnoggle@cuna.coop; fnafei@patelco.org
Subject: Developing the Administration's Approach to Consumer Privacy
Date: Monday, November 5, 2018 6:01:58 PM
Attachments: [image001.png](#)

Dear Administrators,

Thank you for the opportunity for input in your design of consumer privacy outcome goals. We are Patelco Credit Union. We serve over 300,000 members in Northern California and have over \$6 billion in assets.

We applaud your approach of specifying outcomes and letting industry develop ways to achieve them. The seven goals you have set out are in your request are all important and we support them. We would suggest you add two more.

- Companies must ensure the vendors they hire to handle their customers' personal data are also secure and liable for that security.
- The government should lower barriers to allow companies to share their methods and to collaborate in stopping fraud.

While we understand this project plans to set high standards for companies, any privacy policy design must also address the enormous role fraud plays in compromising personal data. Data breaches make headlines, but the total monetary loss due to companies being attacked by cyber thieves is small compared to the losses consumers suffer from being attacked directly by identity thieves and fraudsters. We keep very tight control over our data, and require all our vendors who handle our data to do the same.

Yet our members lose huge amounts of money by being tricked in to giving away their logon credentials, by letting their card data be compromised, and by just not keeping close enough track of activity on their accounts. We spend a lot of time and effort to educate our members to protect themselves. If the Administration wants to design a safety net for consumer privacy, then we could really use your help raising awareness of how important it is for consumers to protect themselves.

FinCEN does a fine job catching thieves once they have committed a crime. Consumers can stop crimes from happening by knowing how to keep their data private. We would highly support adding financial security education to your overall policy design.

Thank you for this opportunity to add our voice for your consideration.

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