# Electronic Fund Transfer Act (EFTA)

# POLICY STATEMENT

# It is the policy of Rewarding HealthyHabits, LLC dba HealthyHabits to comply with the requirements of the Electronic Fund Transfer Act (15 USC 1693) (the “EFTA”) and Regulation E (12 CFR 1005). The Rewarding HealthyHabits, LLC dba HealthyHabits permits members to access their transaction and savings accounts by electronic fund transfer (EFT).

Through the execution of this policy, the board directs management to implement procedures that will establish the rights, liabilities, and responsibilities of all participants in the EFT system. It will be the responsibility of compliance officer to be aware of the regulations and laws governing such transactions and to ensure that the Rewarding HealthyHabits, LLC dba HealthyHabits is in compliance with the law and regulation at all times.

# COVERAGE

# This policy covers any type of EFT that authorizes the Rewarding HealthyHabits, LLC dba HealthyHabits to debit or credit a member’s account.

# DISCLOSURE REQUIREMENTS

Disclosures required under Regulation E are to be clear and readily understandable, in writing, and in a form the member may keep.

# INITIAL DISCOLSURES

# Initial written disclosures will be made at the time a member contracts for an EFT service or before the first EFT is made involving the member’s account. If an EFT service is added to a member’s account and is subject to terms and conditions different from those described in the initial disclosures, the Rewarding HealthyHabits, LLC dba HealthyHabits will provide disclosures for the new service.

# PERIODIC STATEMENTS

# The Rewarding HealthyHabits, LLC dba HealthyHabits will provide each member with a periodic monthly statement for each account accessed by means of an EFT. Members may elect to receive these statements either by mail, online, or in person at the Rewarding HealthyHabits, LLC dba HealthyHabits. For those members who elect the latter option, it is not necessary for the Rewarding HealthyHabits, LLC dba HealthyHabits to keep the member’s physical statements on file, but the Rewarding HealthyHabits, LLC dba HealthyHabits will be able to generate copies of the statements when requested.

# CHANGE IN TERMS NOTICE

# Rewarding HealthyHabits, LLC dba HealthyHabits will mail or deliver a written change in terms notice to the member, 21 days before the effective date, of any change in a term or condition that we disclosed initially