



**DCUC**  
DEFENSE CREDIT UNION COUNCIL

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**Anthony R. Hernandez**  
President/CEO

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The Honorable French Hill  
Chairman, House Committee on Financial Services  
2129 Rayburn House Office Building  
Washington, DC 20515-3310

The Honorable Andy Barr  
Chairman, House Subcommittee on Financial Institutions  
Committee on Financial Services  
2129 Rayburn House Office Building  
Washington, DC 20515-3310

Via email: [fsc119@mail.house.gov](mailto:fsc119@mail.house.gov)

Dear Chairman Hill and Chairman Barr:

On behalf of the Defense Credit Union Council (DCUC)<sup>1</sup>, thank you for the opportunity to respond to the Committee to provide feedback on current consumer financial data privacy laws and the potential legislative proposals to account for changes in the consumer financial services sector. DCUC represents credit unions serving the U.S. military, veterans, and their families worldwide. Our members are deeply committed to safeguarding the financial well-being and sensitive data of the Americans who serve our great nation.

We commend the Committee and Subcommittee for the thoughtful examination of Title V, Subtitle A of the Gramm-Leach-Bliley Act (GLBA). Below are DCUC's responses to the specific questions raised:

1. Should we amend the Gramm-Leach-Bliley Act (GLBA) or consider a broader approach?

DCUC supports modernization rather than replacement of the GLBA. Credit unions already comply diligently with its privacy provisions, which are a solid foundation. Any updates should focus on addressing the digital environment, including data practices of fintech and nontraditional providers that are now prevalent in the financial services marketplace and did not exist when the legislation was passed.

2. Should we consider a preemptive federal GLBA standard or maintain the current GLBA federal floor approach?

DCUC supports a uniform, preemptive federal standard. A single national framework provides certainty and consistent protection. A patchwork of different state privacy laws creates compliance complexity and consumer confusion. A single national standard would ensure consistent consumer protection and a level playing field for financial services providers.

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<sup>1</sup> The Defense Credit Union Council represents more than 200 defense-affiliated credit unions and over 40 million members—including active-duty servicemembers, Guard and Reserve personnel, veterans, Department of Defense civilians, and military families.

3. If GLBA is made a preemptive federal standard, how should it address state laws that only provide for a data-level exemption from their general consumer data privacy laws?

DCUC recommends clear federal preemption of state consumer data privacy laws where they conflict with the GLBA requirements. States should be able to go further with their laws if their requirements are consistent with the federal consumer protections.

4. How should GLBA relate to other federal consumer data privacy laws, both a potential general data privacy law and current sector-specific laws? Should GLBA “financial institutions” be subject to entity-level or data-level exemptions from these laws?

DCUC believes that credit unions should be granted entry-level exemptions from the new federal privacy laws if they already comply with GLBA. This would avoid dual compliance for credit unions.

5. How should we define “non-public personal information” within the context of privacy regulations? Does the term “personally identifiable financial information” in GLBA require modification?

These current definitions are overly broad, making effective compliance less workable. These terms should be narrowed in scope to focus on information that could cause financial harm if misused.

6. Do the definitions of “consumer” and “customer relationship” in GLBA require modification?

DCUC recommends clarifying these terms to exclude one-time transactions or inquiries from these definitions, so it is clear the definitions represent customer relationships and not casual, one-off contacts. There should also be clarification as to what constitutes an ongoing relationship in digital and fintech contexts where customer relationships are less traditional. The terms should not be made broader, where compliance difficulty would outweigh consumer benefit.

7. Does the current definition of “financial institution” sufficiently cover entities that should be subject to GLBA Title V requirements, such as data aggregators?

This definition should be expanded to cover fintech companies and data aggregators that handle sensitive financial data but that are not subject to GLBA requirements. Credit unions should not be among the few institutions subject to these standards where others in the marketplace do not have similar obligations. If fintech companies and data aggregators are not held to the same standards as credit unions, they become the weak link in the financial system and a waiting target. Consistent standards for all institutions are what keep everyone’s data safe.

8. Are there states that have developed effective privacy frameworks? Which specific elements from these state-level frameworks could potentially be adapted for federal implementation?

State laws and frameworks should not be a substitute for a uniform federal rule. A national framework is needed to best protect consumers and provide consistency in the industry.

9. Should we consider requiring consent to be obtained before collecting certain types of data, such as PIN Numbers and IP addresses?

While we support requiring consent for collecting sensitive data, we do not support this for the collection of routine data, where the administrative burden would outweigh the consumer benefit.

10. Should we consider mandating the deletion of data for accounts that have been inactive for over a year, provided the customer is notified and no response is received?

DCUC supports allowing financial institutions to establish these schedules based on their consumers risk profiles and needs.

11. Should we consider requiring consumers be provided with a list of entities receiving their data?

We support transparency for consumers provided requirements are not confusing and are operationally feasible for credit unions.

12. Should we consider changing the structure by which a financial institution is held liable if data it collects or holds is shared with a third-party, and that third-party is breached?

We support shared accountability when working with third parties, as mutual responsibility in the financial industry is important.

13. Should we consider changes to require or encourage financial institutions, third parties, and other holders of consumer financial data to minimize data collection to only collection that is needed to effectuate a consumer transaction and place limits on the time-period for data retention?

We support reasonable data collection limitations as long they do not conflict with other legal obligations or consumer benefits.

DCUC appreciates the Committee's leadership in examining how GLBA can be modernized to reflect today's financial services environment. Our members place the highest priority on data protection. We encourage Congress to ensure that any reforms balance protections for consumers with practical compliance for institutions and accountability for all entities that handle sensitive financial data.

Thank you again for the opportunity to provide this input. We look forward to collaborating with the Committee as policies are developed.

Respectfully submitted,

Sincerely,



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President & CEO  
Defense Credit Union Council