

Statement of Privacy Policy

The purpose of this statement is to explain how we keep certain information private and secure, while using it to serve you better. This notice is provided as required by federal privacy law and refers to our current policies and practices.

This statement explains the following:

- Protecting the confidentiality and security of consumer information
- Who is covered by our Privacy Policy and revisions to the policy
- The types of information we have about you and where it comes from
- Sharing information with affiliated companies
- Sharing information for legal, business, and joint marketing purposes

PROTECTING CONFIDENTIALITY AND SECURITY OF CONSUMER INFORMATION

We take seriously our responsibility to respect the confidentiality and security of nonpublic personal information - called "Consumer Information" in this notice. Our policy calls for safeguards to protect consumer information only by those who need access to do their work. The same holds true for our affiliated companies, which are companies that, now or in the future, we own (or control), or are owned (or controlled) by, or are under common ownership (or control) with. We also may maintain, as required by applicable federal regulations, physical, electronic, and procedural safeguards to guard your nonpublic personal information.

WHO IS COVERED BY THE PRIVACY POLICY & REVISIONS TO THE POLICY

Our privacy policy applies to individuals (and their legal representatives) who are our consumers or customers in connection with financial services, employees and job applicants.

This notice also describes the privacy policy of our affiliated companies, except as stated in separate notices they give you. We reserve the option of revising this notice and our privacy policy from time to time, but we will provide notice of the revised policy before disclosing consumer information about you other than as described in this notice.



INFORMATION WE COLLECT

We collect and use information about you from various sources. The amount and nature of the information collected and used varies from transaction to transaction, but the information described in the following five types:

1. Information from you. Information you provide to us on applications, other forms, and by other means, such as your name, address, social security number, assets, income, and debt;
2. Information from our experience and our affiliated companies' experiences. Information about your transactions and account experience with us or our affiliated companies, such as parties to transactions, contract or lease balances, payment history, and communications and correspondence;
3. Information from the experience of other parties. Information from other outside sources regarding their employment, credit or other relationships, account experience, or transactions with you, or verifying representations made by you, such as your employment history, credit balances, or your property or liability insurance coverage.
4. Information from credit reports. Information supplied by consumer reporting agencies, such as information regarding your creditworthiness or credit history;
5. Other general information. Other general information we obtain about you (such as demographic information) that is not assembled for the purpose of determining your eligibility for credit, insurance, employment or other products or services.

SHARING INFORMATION WITH AFFILIATED COMPANIES

We may disclose to our affiliated companies all of the information we collect about you as described in each of the five categories above. Our affiliated companies can be financial service providers and non-financial companies. This sharing permits us to give you superior service, make a wider range of products available, and operate our business more effectively. We do not share information with nonaffiliated third parties, other than described below under "Sharing Information for Legal and Routine Business Reasons and for Joint Marketing". Where they apply, we reserve limits and restrictions set by law as to sharing certain kinds of information with our affiliates. For example, unless you authorize the sharing, we do not disclose credit worthiness information about you from credit reports.



SHARING INFORMATION FOR LEGAL AND GENERAL BUSINESS REASONS AND FOR JOINT MARKETING

We may disclose any of the above five types of consumer information to credit bureaus and similar organizations, and otherwise when permitted by law. For example, this may include a disclosure in connection with a subpoena of similar legal process, a fraud investigation, recording motor vehicle registration and other documents in public records, an audit or examination, or the sale of your account to another financial institution. We may also share any of the above five types of consumer information outside of our affiliated companies if we have your consent, such as when you're requested to be contacted by other companies we work with.

We may also share all five types of consumer information above with companies that work for us, possibly including some of our own affiliated companies, to perform services or functions on our behalf. These companies may include financial service providers such as banks, finance companies, and non-financial companies. We may also share the five types of consumer information above with companies that work for us to provide marketing and other services of with financial institutions with whom we have joint marketing agreements. These companies act on our behalf and, within the time required by law, will be required by law, will be required by our policy to be contractually obligated to keep the information that we provide to them confidential and to use the information that we provide to them confidential and to use the information only to provide the services we've asked them to perform for us.