

# Privacy Policy

## Keeping Your Information Safe and Secure

### Highlights of Our Commitment to You

- We do not sell customer information to third parties.
- We do not share customer information with outside parties who may wish to market their products to you.
- We safeguard your customer information carefully.
- We are committed to protecting your customer information in every transaction, at every level of our organization.
- We are committed to helping you protect your privacy every day.

**This document includes the Privacy Policy, which describes how we use and protect your customer information. We believe that protecting your privacy is an integral part of the service we provide to you.**

### How We Protect and Use Customer Information

#### **1. We are committed to protecting the security and integrity of customer information through procedures and technology designed for this purpose.**

- We limit employee access to customer information to those who have a business reason to know. Employees are required to honor our code of conduct, which includes standards for protecting customer confidentiality.
- We maintain policies and procedures covering the proper physical security of workplaces and records.
- Our physical, electronic, and procedural safeguards meet or exceed federal standards regarding the protection of customer information.
- We require contractors and outside companies who work with us to adhere to strict privacy standards through their contracts with us.

#### **2. We collect and maintain customer information as part of servicing your account and your customer relationship.**

In the course of serving you, we collect information about you from a variety of sources, such as:

- Information you provide to us on applications or forms, such as your income and accounts with others;
- Information we receive from an outside company, such as a credit bureau, regarding your credit history or employment status; or
- Information about your transactions or experiences with companies affiliated with ours.

### **3. The customer information we collect is used to service your accounts and meet your financial needs.**

Information may be used among our affiliate companies, as well as with authorized third parties (described in section 4), for a number of purposes, such as:

- **To protect your accounts** from unauthorized access or identity theft.
- **To process your requests** such as loan applications, purchases, and ATM withdrawals.
- **To service your accounts** by issuing checks, ATM cards, and account statements.
- **To keep you informed** about financial services of interest to you.

### **4. We do not share customer information with outside parties who may wish to market their products to you.**

We may disclose the information we collect to non-affiliated third parties that are acting on our behalf, or as permitted or required by law, including:

- Companies that perform support services for us, such as data processors, technical systems consultants, or check printers.
- Companies that help us market products and services to you, conduct surveys or provide marketing research.
- Government entities, courts or other entities (in response to subpoenas and other legal processes), or those with whom you have requested us to share information.
- **Important Notice about Credit Reporting: We may report information about your account(s) to credit bureaus and/or consumer reporting agencies. Late payments, missed payments, or other defaults on your account(s) may be reflected in your credit report and/or consumer report.**

### **5. Your choices for information sharing and marketing.**

- We may disclose all of the information we collect, as described above, within our affiliated companies, which include administrative and service units, consumer bankers, mortgage lenders, consumer lenders, securities broker-dealers, insurance agencies, and real estate brokerage companies.
- By law, information that is derived from your transactions and experiences with us may be shared among our affiliate companies (a) for purposes other than direct marketing, and (b) unless you instruct us otherwise, for direct marketing purposes.
- If you choose to limit information sharing, we will not share personal financial information about you among affiliates (other than information derived from your transactions and experiences with our affiliate companies) for any purpose, except as permitted by law. In addition, if you select that option, we will limit affiliates' use of transaction, experience and other personal financial information about you for direct marketing purposes. However, your choice

regarding the use of certain information for marketing purposes does not apply to any affiliate company that has an existing business relationship with you or where the use is otherwise permitted by law. To opt out of information sharing and marketing, use one of the methods described below. Your election will apply until you tell us to change your choice.

■ **Telephone and mail preferences.**

In addition to information sharing preferences, you may request that we not contact you for marketing purposes by telephone. For consumer accounts, this election will be effective while you are an active customer or a minimum of five years. For business accounts, this election will be effective for five years from the date the election is received. You may also request that we not contact you for marketing purposes by mail. For all accounts, this election will be effective for three years.

■ You may instruct us not to share certain personal financial information as described in section 5 by calling **1-866-599-9159**. You may notify us of your preference at any time.

■ **Do Not Call Policy:** This Privacy Policy constitutes our Do Not Call Policy under the Telephone Consumer Protection Act for all consumers. We maintain an internal Do Not Call preference list. Do Not Call requests will be honored within 30 days and will be effective for at least five years from the date of request. No telemarketing calls will be made to residential or cellular phone numbers that appear on our Do Not Call list.

■ As a customer, please note that if you choose not to receive solicitations by mail or any other channel, you may continue to receive marketing information about our products or services in regular account mailings and statements, when you visit us online or at an ATM. You may also receive survey calls.

**6. State Laws, Trust Accounts.**

Some state laws may impose additional restrictions on disclosure of information on customers for certain purposes in those states.

■ **Nevada Residents** – Nevada Statute Section 228.600(3) allows marketing calls to our existing customers listed on the National Do Not Call Registry. If you prefer not to receive marketing calls from us, you may be placed on our Internal Do Not Call list by following the instructions in the “Your Choices” section 5 above.

You may also contact the Nevada Attorney General’s office:  
Bureau of Consumer Protection Office of the Nevada Attorney General  
555 E. Washington Street, Suite 3900  
Las Vegas, NV 89101  
Phone: (702) 486-3132  
Email: BCPINFO@ag.state.nv.us

- **Vermont Residents** – In accordance with Vermont law, we will not share personal financial information about you, other than transaction and experience information, with other affiliated companies for any purpose, nor will we share any personal financial information about you with other affiliated companies for marketing purposes.
- **Trust accounts**, for which we or our affiliates are the trustee, are protected under special rules of confidentiality, and trust account information is not shared for marketing purposes without specific consent.

### **Tips To Help You Protect Your Personal Information**

- Carry only necessary information with you. Leave your Social Security card and unused credits cards at home in a safe location.
- Make photocopies of vital information you carry regularly and store them in a secure place, such as a safe deposit box.
- Do not provide your Social Security Number unless absolutely necessary.
- Shred documents containing personal or financial information before discarding. Fraud and identity theft often occurs as a result of mail and garbage theft.
- Place outgoing mail in a U.S. Postal Service mailbox to reduce the chance of mail theft.
- Promptly retrieve incoming mail to reduce the opportunity for theft.
- Monitor your credit report for accuracy. By law, you are entitled to receive one free credit file disclosure every 12 months from each of the nationwide consumer credit reporting companies. To learn more or request a copy of your credit report, visit [annualcreditreport.com](http://annualcreditreport.com) or call 1-877-322-8228.

### **Assistance to Victims of Identity Theft**

You should also report the crime to your local law enforcement agency and to the Federal Trade Commission (FTC). To speak with a trained FTC telephone counselor, call toll-free at **1-877-IDTHEFT (1-877-438-4338)**. To enter information about your complaint into a secure FTC online database, sign onto [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft). The site also provides links to numerous consumer education materials.

### **Unsolicited Credit Offers**

If you want to reduce the number of credit offers you receive, contact the National Consumer Credit Reporting Agencies at **1-888-567-8688 (1-888-5-OPTOUT)** or visit [www.optoutprescreen.com](http://www.optoutprescreen.com) for details. Financial institutions and other companies provide information to the Credit Bureaus for credit verification, fraud control purposes, and prevention of identity theft. You may direct these agencies not to sell or share this information about you for marketing purposes.

This document applies to (1) consumers who have, or have had, a customer relationship or have made an inquiry or application, and (2) individuals who have provided personal information in connection with business accounts, loans, and leasing programs or individuals associated with dealers participating in sales finance programs; and where the consumer relationship, inquiry, application, or personal information is provided.

The policies and practices described in this disclosure are subject to change, but we will communicate any significant changes to you as required by law. The policies and practices described in this disclosure replace all previous notices or statements regarding this subject.

MKT JV (10-09)