**Privacy**

**Statement of Privacy**

**Introduction**

Our most important asset is our clients’ trust. Keeping client information secure and using it only as our clients would want us to is our top priority. Our clients furnish sensitive information to our banks and subsidiaries in the course of daily business, and our organization is committed to treating such information responsibly. We know that our clients expect privacy and security for their personal and financial affairs. In that spirit, we disclose to you our privacy policies and the measures we take to keep your information secure.

**Types of Information We Collect**

The type of non-public personal information we may collect comes to us from a variety of sources, including:

* Information you provide directly to us on applications or otherwise such as Social Security number, assets and income.
* Information related to your transactions with our banks or with others such as account balance, payment history and credit card usage.
* Information we receive from third parties such as consumer reporting agencies.

We limit the collection and use of information about our clients to that which is necessary to administer our business, provide superior service and offer opportunities that we think will be of interest to our clients, so long as such use is not precluded by federal regulations.

**Types of Information We Disclose**

**Outside or Joint Marketing**

We may disclose the information we collect, as described above, to companies that perform marketing services on our behalf or to other companies with whom we have joint marketing agreements. We carefully select these companies and contractually require them to adhere to our strict standards of information security and confidentiality.

**Non-affiliated Third Parties**

We will not provide your personal information to non-affiliated companies for the purpose of their independent telemarketing or direct mail marketing of any non-financial products or services.