

BRAND PRIVACY POLICY FOR INDIVIDUALS

This disclosure explains how the Brand family of companies protects and uses your information in a safe, secure and responsible manner.

- **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.**
- **Within the Brand family of companies, we safeguard your customer information carefully.**
- **We are committed to protecting our customer information in every transaction, at every level of our organization.**
- **We are committed to helping you protect your privacy every day.**

For more than 100 years, the Brand name has been a trusted symbol of service and reliability, and we remain dedicated to those principles today. You can count on us to provide you with the responsible, professional service you deserve, and to protect your privacy and security along the way.

HOW WE PROTECT AND USE CUSTOMER INFORMATION

1. **We strive to safeguard your data. We do this by:**
 - Setting policies and procedures for carefully handling your information;
 - Limiting employee access to sensitive information;
 - Requiring independent contractors and outside companies who work with us to adhere to strict privacy standards through their contracts with us.
 - Employing technological means (such as backup files, virus detection and eradication software, firewalls, and other computer software and hardware) to protect against unauthorized access or alterations to customer data;
 - Conducting background checks on all employees and providing privacy training.
2. **We collect and maintain customer information as part of servicing your account and your customer relationship.**
 - 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.
 - Information about your transactions or experiences with the Brand family of companies.
3. **The customer information we collect is used to serve your accounts and meet your financial needs.**

Information may be used among the Brand family of 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 identify 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 information with outside parties who may wish to market their products to you.**

We have arrangements with companies whose experience is essential for our own services to operate properly. We may disclose the information we collect, as described above, with companies that perform support services for us, such as data processors, technical systems consultants and programmers, check printers, or companies that help us market Brand products or services to you. We may also share certain information with companies that help us conduct surveys or market research.



There are other situations when we may disclose to third parties the customer information we collect as permitted or required by law. Third parties could include government entities, courts or other entities (in response to subpoenas and other legal processes), and those with whom you have requested us to share information.

It is standard banking industry practice and within federal and state law for Brand to routinely provide data about client loan repayment and transactions 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.

It is important to note that we do not share customer information with other companies for the purpose of marketing their products to you, unless you specifically request in advance that we do so. It is not necessary for you to instruct us not to share information with these outside companies, because we will automatically keep your information confidential.

5. **Within the Brand family of companies, we share information so that we can work together to serve you.**

We may disclose all of the information we collect, as described above, within The Brand Banking Company, including Brand Mortgage Group and Brand Financial Services or a company that becomes an affiliate subsequent to this disclosure. We do not disclose any nonpublic personal information about our customers or former customers to anyone else, except as permitted by law.

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

