

PRIVACY POLICY

Rev. November 2010

FACTS	WHAT DOES COMMENCEMENT BANK DO WITH YOUR PERSONAL INFORMATION?
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WHY?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share and protect your personal information. Please read this notice carefully to understand what we do.
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WHAT?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> Social security number and income Checking account information and payment history Credit card history and credit scores <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p>
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HOW?	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information, the reasons Commencement Bank chooses to share, and whether you can limit this sharing.
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Reasons we can share your personal information:	Does Commencement Bank share?	Can you limit this sharing?
For our everyday business purposes —such as to process your transactions maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes —to offer our products and services to you	No	We don’t share
For joint marketing with other financial companies	No	We don’t share
For our affiliates’ everyday business purposes —information about your transactions and experiences	No	We don’t share
For our affiliates’ everyday business purposes —information about your credit worthiness	No	We don’t share
For our affiliates to market to you	No	We don’t share
For non-affiliates to market to you	No	We don’t share

Questions?	Call 1-877-284-1880 or go to www.commencementbank.com
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WHAT WE DO	
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How does Commencement Bank protect my personal information?	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.</p> <p>Employees are trained to respect customer privacy and may access customer information only for legitimate business reasons, such as providing services for you or to perform their job.</p>
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How does Commencement Bank collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> Open an account or apply for a loan Provide account information or provide employment information Make deposits or withdrawals from your account <p>We also collect your personal information from other companies.</p>
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Why can’t I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> Sharing for affiliates’ everyday business purposes—information about your creditworthiness Affiliates from using your information to market to you
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	<ul style="list-style-type: none"> • Sharing for non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
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DEFINITIONS	
Affiliates	<p>Companies related by common ownership or control. They can be financial and non-financial companies.</p> <p><i>Commencement Bank has no affiliates.</i></p>
Non-affiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <p><i>Commencement Bank does not share with non-affiliates so they can market to you.</i></p>
Joint marketing	<p>A formal agreement between non-affiliated financial companies that together market financial products or services to you.</p> <p><i>Commencement Bank does not jointly market.</i></p>