

Gramm-Leech-Bliley
Notices Interagency Meeting

*Developing Compliant and
Consumer Friendly Privacy
Policy Notices*

Tuesday, February 17, 2004
SEC Building, Room 1C30 • 450 5th Street, Washington, D.C.

Since 1999 Keystone Expressions, Ltd.
has produced over **4 Million** Privacy Policy Notices
for our nation's Credit Unions, Banks
and Savings and Loans.



*What characteristics do
the financial institutions who chose Keystone
to satisfy federal regulators' requirements for
providing Privacy Policy Notices share?*

- Regulating Agencies?
 - Asset Size?
 - Size of Order?

• Characteristics of Keystone's
Financial Customers —

REGULATING AGENCIES

- 55% - Credit Unions regulated by NCUA
- 45% - Banks, National Banks, Savings Banks,
Savings and Loans regulated by FDIC, OTS & OCC

• Characteristics of Keystone's
Financial Customers —

ASSET SIZE

- Average - \$70,000,000
- Smallest - \$33,356
- Largest - \$2,044,090,000

• Characteristics of Keystone's
Financial Customers —

SIZE OF ORDER

- Average - 5,000 disclosures for distribution
- Smallest - 100 disclosures for distribution
- Largest - 100,000 disclosures for distribution

SO... What characteristics do the financial institutions who chose Keystone to satisfy federal regulators' requirements for providing Privacy Policy Notices share?

They Value The Following in Their Disclosure:

- **Eye Catching, Distinctive** Graphics
- **Reader Friendly, Compliant** Copy

• Eye Catching, Distinctive Graphics

Cover Art Immediately Signifies Purpose and Content of Disclosure

Imagery conveys the desirable promise of anonymity.

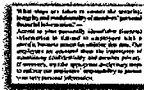
Subtext conveys the importance of consumer privacy to the disclosing financial institution.

Availability in a variety of colors further distinguishes the institution's disclosure.



• Reader Friendly, Compliant Copy

Arrangement of required disclosure topics in a conversational, question and answer format.



Bulleted lists of required information such as:

- **Categories of information collected**
- **Categories of information disclosed**
- **Categories of affiliates and non-affiliated third parties to whom you disclose information**

• **Inform you of additional services, products, and programs that may be available to you**

• **We may provide data on your behalf to our service providers and other third parties**

*How do Keystone's
Privacy Policy Disclosures
compare to the Agencies goals
for Privacy Notices?*

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compare to the Agencies goals for Privacy Notices?*

What Are the Goals of A Privacy Notice?

- Disclosure of Notices in a manner that they can reasonably be expected to be understood by the consumer, WHILE:
- complying with federal regulations
 - enhancing the relationship with the issuing institution.

SECURITY INTEGRITY CONFIDENTIALITY

*How do Keystone's Privacy Policy Disclosures
compare to the Agencies goals for Privacy Notices?*

What Are the Goals of A Privacy Notice?

- Explanation of a consumer's right to opt out (when applicable)
- Clear instructions on how that wish can be fulfilled



Security

Integrity

Confidentiality



**YOUR IMPRINT HERE
ADDRESS**

ORDER ITEM # IL-001-02
Keystone Expressions, Ltd. 1-800-648-5785

OUR
**PRIVACY
POLICY**

The following privacy principles were established to maintain the security, integrity and confidentiality of your personal financial information.

The type of information we collect —

We routinely collect and retain the information we obtain from your account applications, transaction history (*for deposits, loans, credit cards, etc.*) and from consumer reports. This information helps us:

- To establish and administer your accounts.
(*Example: We ask for personally identifying information to protect your accounts from fraud.*)
- To satisfy certain regulatory requirements.
(*Example: When you open an account that pays interest, we are required by the Internal Revenue Service to obtain your social security number.*)
- Better understand you so that we may provide you with additional or improved products and services.
(*Example: We require information concerning your credit history and your assets to determine if you qualify for loan approval.*)

We do not share the nonpublic personal information of our current or previous members and nonmember customers with affiliates or nonaffiliated third parties except as permitted or required by law.

How is that information protected?

Access to your personally identifiable financial information is limited to employees with a specific business reason for utilizing this data. Our employees are educated about the importance of maintaining confidentiality and member privacy. If necessary, we take appropriate disciplinary steps to enforce our employees' responsibility to protect your very personal information.

In order to prevent unauthorized access to your information, we maintain security standards and procedures that conform with industry practices. These security standards and procedures are routinely tested to verify the integrity of our systems.

OUR PRIVACY POLICY

Security

Integrity

Confidentiality



**YOUR IMPRINT HERE
ADDRESS**

ORDER ITEM # F-001-04
Keystone Expressions, Ltd. 1-800-648-5785
C12-2001

OUR PRIVACY POLICY

The following privacy principles were established to maintain the security, integrity and confidentiality of your personal financial information.

The type of information we collect —

We routinely collect and retain the information we obtain from your account applications, transaction history (*for deposits, loans, credit cards, etc.*) and from consumer reports. This information helps us:

- To establish and administer your accounts.
(*Example: We ask for personally identifying information to protect your accounts from fraud.*)
- To satisfy certain regulatory requirements.
(*Example: When you open an account that pays interest, we are required by the Internal Revenue Service to obtain your social security number.*)
- Better understand you so that we may provide you with additional or improved products and services.
(*Example: We require information concerning your credit history and your assets to determine if you qualify for loan approval.*)

The type of information we disclose, and who we share it with —

We occasionally share your information under the following circumstances:

- Sharing your information with nonaffiliated service providers -
It is sometimes necessary for us to provide information such as your transaction history, account balance, name and address to a third party who provides services for us. This may include vendors who prepare account statements, process checks or provide support for one of our products or services. We are permitted by law to disclose this information when our contract with these service providers specifies that:
 - *Our vendors must abide by applicable privacy laws and reflect our commitment to the confidentiality of your information.*
 - *All information disclosed is to be used only for the purpose for which it was originally intended.*

It is also permissible for us to provide financial information to one or more other financial institutions for the purpose of jointly marketing our products and services.

- Sharing your information with nonaffiliated third parties as permissible by law -

We only make disclosures of our current and previous members' and nonmember customers' nonpublic personal information to other nonaffiliated companies as permitted or required by law. These disclosures include but are not limited to sharing nonpublic personal information:

- *When we have received your prior consent.*
- *When necessary to complete a transaction you have initiated, such as a credit or debit card purchase.*
- *With a reputable credit bureau or similar consumer reporting agency.*
- *As authorized or required by law or in response to the judicial process.*

What steps are taken to ensure the security, integrity and confidentiality of members' personal financial information? —

Access to your personally identifiable financial information is limited to employees with a specific business reason for utilizing this data. Our employees are educated about the importance of maintaining confidentiality and member privacy.

In order to prevent unauthorized access to your information, we maintain security standards and procedures that conform with industry practices. These security standards and procedures are routinely tested to verify the integrity of our systems.

We strive to keep your information as accurate as possible. If you believe there is an error in your information please call us immediately. We will respond to your requests to correct inaccurate information in a timely manner.

We do not sell our member information lists to nonaffiliated third parties for marketing, solicitation or similar purposes.

PLACE
STAMP
HERE

YOUR NAME HERE
ADDRESS

OUR PRIVACY POLICY

Security

Integrity

Confidentiality



YOUR IMPRINT HERE
ADDRESS

• Sharing your information with nonaffiliated third parties as permissible by law -
We make disclosures of our current and previous members' and nonmember customers' information to other nonaffiliated companies as permitted or required by law. These disclosures include but are not limited to sharing nonpublic personal information:

- When we have received your prior consent.
- When necessary to complete a transaction you have initiated, such as a credit or debit card purchase.
- With a reputable credit bureau or similar consumer reporting agency.
- As authorized or required by law or in response to the judicial process.

We reserve the right to disclose nonpublic personal information about our members to non-affiliated financial service providers and non-affiliated companies for marketing or related purposes unless you direct us not to on the attached opt out form.

- We may provide asset or credit history information to insurance companies and credit card providers.
- We may provide identifying information to retailers, airlines, publishers, etc. who can inform you of special offers.
- We may also provide your information to non-profit organizations.

Your Right to "Opt Out" —

Federal Law provides consumers an opportunity to decline having certain categories of information shared among affiliated companies or with non-affiliated third parties. We have included a return mail "opt out" form with this disclosure for your convenience. Detach and return this completed form within 30 days of receiving this privacy policy brochure.

If you request that we do not share your information under the specific circumstances listed in this notice, we will comply with your wishes in a timely manner. Your choice to "opt out" will remain effective until you choose, in writing, to revoke it. In the case of a joint relationship, an opt out election by one individual will apply to the entire account.

If you do not return this form or if you indicate your approval, we reserve the right to share your information with reputable vendors we feel can provide products and services of value and interest to you.

OUR PRIVACY POLICY

Security

Integrity

Confidentiality



YOUR IMPRINT HERE
ADDRESS

ORDER ITEM # F-001-062
Keystone Expressions, Ltd. 1-800-648-5785

OUR PRIVACY POLICY

The following privacy principles were established to maintain the security, integrity and confidentiality of your personal financial information.

The type of information we collect —

We routinely collect and retain the information we obtain from your account applications, transaction history (for deposits, loans, credit cards, etc.) and from consumer reports. This information helps us:

- To establish and administer your accounts.
- We ask for personally identifying information to protect your accounts from fraud.
- To satisfy certain regulatory requirements.
- When you open an account that pays interest, we are required by the Internal Revenue Service to obtain your social security number.
- Better understand you so that we may provide you with additional or improved products and services.
- We require information concerning your credit history and your assets to determine if you qualify for loan approval.

What steps are taken to ensure the security, integrity and confidentiality of members' personal financial information? —

Access to your personally identifiable financial information is limited to employees with a specific business reason for utilizing this data. Our employees are educated about the importance of maintaining confidentiality and member privacy. If necessary, we take appropriate disciplinary steps to enforce our employees' responsibility to protect your very personal information.

In order to prevent unauthorized access to your information, we maintain security standards and procedures that conform with industry practices. These security standards and procedures are routinely tested to verify the integrity of our systems.

The type of information we disclose, and who we share it with —

We occasionally share your information under the following circumstances:

- Sharing your information with our affiliates - Within our family of affiliated financial service providers, we are permitted to share information necessary for conducting business and to help us

inform you of additional mortgage lending, life insurance, or security brokerage products and services. As a result we are permitted to share:

- Transaction information such as account balances and payment history;
- Identifying information including your name, address and social security number.

We may also share the following types of "Opt Out" information among our affiliates unless you direct us not to on the attached opt out form:

- Application information like assets and income;
- Credit report information including your creditworthiness and credit history;
- Information obtained by verifying representations you have made such as your open lines of credit;
- Information we have obtained from another person regarding their employment, credit or other relationship with you such as your employment history.

Please refer to the section entitled "Your Right to Opt Out" for additional information concerning your rights to limit the information about you we are permitted to share.

- Sharing your information with nonaffiliated service providers —

It is sometimes necessary for us to provide information such as your transaction history, account balance, name and address to a third party who provides services for us. This may include vendors who prepare account statements, process checks or provide support for one of our products or services. We are permitted by law to disclose this information when our contract with these service providers specifies that:

- Our vendors must abide by applicable privacy laws and reflect our commitment to the confidentiality of your information.
- All information disclosed is to be used only for the purpose for which it was originally intended.

It is also permissible for us to provide financial information to one or more other financial institutions for the purpose of jointly marketing our products and services.



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F-001-062 Rev. 1/01

OPT OUT RESPONSE FORM INSTRUCTIONS:

1. Carefully read and review the information contained within this Privacy Policy brochure.
2. Review the Opt Out Response Form and mark the box that corresponds with your decision.
3. Fill out the information requested on the Opt Out Response Form. This information is necessary for us to update our records concerning your decision.
4. Sign and Date the Opt Out Response Form where indicated. Please note that a signature is required.
5. Detach this Return Mail Response Form where indicated. Retain the privacy policy brochure for your reference.
6. Fold the response form with our address on the outside and your confidential response information on the inside.
7. Seal the top with tape and mail the response form with the proper postage or feel free to bring the completed form with you on your next visit.

Sharing Among Our Family of Affiliates

We reserve the right to disclose your "Opt Out" information to our affiliated companies unless you direct us not to. These companies may make available products or services that we feel would be of interest to you. Please indicate your choice concerning sharing your information with these companies by marking the appropriate box below. Your request will be handled in a timely manner.

NO, you may not share my "Opt Out" information (such as my assets and income, credit worthiness, credit history, open lines of credit, employment history, etc.) with your affiliated companies for marketing or related purposes.

YES, you have my permission to share my "Opt Out" information (such as my assets and income, credit worthiness, credit history, open lines of credit, employment history, etc.) with affiliated companies you feel will provide me with information about products and services of value to me.

Sharing with Nonaffiliated Third Parties

We reserve the right to disclose your nonpublic personal information to nonaffiliated companies. These companies may make available products or services that we feel would be of interest to you. Please indicate your choice concerning sharing your information with these companies by marking the appropriate box below. Your request will be handled in a timely manner.

NO, you may not share my nonpublic personal information with nonaffiliated companies for marketing or related purposes such as those mentioned above.

YES, you have my permission to share my nonpublic personal information with companies you feel will provide me with information about products and services of value to me.

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SOCIAL SECURITY NUMBER

NAME (PLEASE PRINT)

ADDRESS (INCLUDE P.O. BOX)

CITY

STATE

ZIP

PHONE

SIGNATURE

(RESPONSE FORM MUST BE SIGNED)

DATE

This opt out response form is provided in compliance with Sections 502 and 506 of the Gramm-Leach-Bliley Act (Pub. L. 106-102 codified at 15 U.S.C.). Your reply must be received within 30 days of receipt of the attached privacy policy disclosure. If you do not return this form or if you indicate your approval, we reserve the right to share your information with reputable vendors we feel can provide products and services of value and interest to you.

Cut along fold