
Mall Intercept Study of Consumer Understanding of Financial Privacy Notices: Methodological Report

Submitted to:

Federal Trade Commission
600 Pennsylvania Avenue, NW, Room 702
Washington, DC 20580

Submitted by:



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September 18, 2008

Background

The research described in this report represents the second phase of a project co-sponsored by seven federal agencies (“the Agencies”): the Federal Trade Commission (FTC), the Board of Governors of the Federal Reserve (Board), the Federal Deposit Insurance Corporation (FDIC), the National Credit Union Administration (NCUA), Office of the Comptroller of the Currency (OCC), Office of Thrift Supervision (OTS), and Securities and Exchange Commission (SEC). In the first phase of this project, the form development phase, the Agencies contracted with Kleimann Communication Group (KCG) to conduct two focus groups and seven rounds of one-on-one in-depth interviews with consumers to develop a prototype privacy notice that consumers could understand and use to compare privacy policies. The purpose of this second phase of the research was to quantitatively test the extent to which the new prototype notice is more effective and usable for consumers than other alternatives.

The Agencies contracted with Macro International (Macro), a research and evaluation firm headquartered in Calverton, MD, to conduct this quantitative phase of the project.¹ Macro was responsible for collecting the data and submitting a clean dataset and codebook to the Agencies. This report describes the methods that Macro used to conduct this research.

Methodology

Interview Protocol

Macro carried out the survey using mall intercept methodology. Potential respondents were approached by an interviewer on the mall “floor.” The interviewer asked the respondent a series of screening questions (items 3 through 7 in the final protocol in Appendix A). If respondents qualified for the interview based on responses to the screening questions, they were then taken to a self-contained research office in the mall, where they completed the interview. Participants received a stipend of \$5 for completing the interview, which in most cases took 15 to 20 minutes. Interviewers used a CAPI (computer-assisted personal interviewing) instrument to conduct the interviews; participants’ responses were entered into an online system.

For this study, the Agencies developed model privacy notices for three different fictional banks: Mars Bank, Mercury Bank, and Neptune Bank. These three banks were identical except for their information sharing practices—Mars Bank was the most limited in sharing information with other companies, while Neptune Bank shared most broadly. Privacy notices for each of the three banks were tested in each of four different styles: (1) the prototype table notice developed by KCG; (2) the alternative KCG prose version of the prototype notice; (3) a notice based on one in current use; and (4) a notice comprised solely of the sample clauses developed by the Agencies in their privacy regulation. Therefore, a total of 12 notices (3 banks in each of the 4 styles) were developed and used in this study. These notices are provided as Appendix C to this report.

¹ The contract was administered by the FTC.

Each interview participant was shown notices in one of the four styles. These styles were rotated between interviews so that each would be tested approximately the same number of times. The interviewer first asked participants to read privacy notices for two of the three banks, and then asked several questions about the pair. After answering these questions, the participant was then shown a second pair of notices² and asked the same set of questions.

Participants were asked several different types of questions about the privacy notices. First, for each pair, participants were asked to identify which of the two they would select to be their bank based only on the notices. Participants were asked factual questions about the notices, such as, “Does one of these banks share your personal information with others more than the other bank, or do they both share your personal information equally?” Participants were given tasks such as exercising all available options in two notices to limit or opt out of sharing and then determining which bank shared less or which shared more broadly than the other.

Responses were required of all questions, except for those that asked about a respondent’s income or current banking practices. A number of questions, however, allowed respondents to indicate that they did not know the answer.

Treatment of Open-Ended Questions

Although most items on the survey instrument were closed-ended, several allowed participants to provide open-ended answers. For example, after participants indicated their preference for one of two banks they were comparing, they were asked why they preferred the bank they chose. If they indicated that they did not have a preference, or that they did not know which they would choose, they were asked to explain that answer as well.

For all open-ended questions, the interviewer recorded verbatim answers. In the case of the comparison questions described above, Macro’s research team coded these open-ended answers using a coding system that was developed collaboratively by Macro and the interagency group sponsoring the study.

Pre-Testing of Protocol

Macro and the Agencies conducted three rounds of pre-tests of the interview protocol. These pre-tests, which were conducted in an actual mall intercept facility and were attended by representatives of both Macro and the various Agencies involved in the study, had two primary goals. First, they were used to test whether the questions were clear and would be interpreted as intended by participants. Second, they provided an opportunity to clarify the directions that would be given to interviewers, and to identify issues that would be emphasized in onsite interviewer trainings. After each pre-test, Macro and the Agencies made appropriate revisions to the protocol based on findings.

² One notice was repeated in the two pairs of notices.

Training of Interviewers

Before fielding began, a representative from Macro’s research team visited each of the five locations to conduct a training session with interviewers. In addition, the director of each local facility also attended this training. The training focused on explaining the goals of the study, clarifying the screening criteria, and familiarizing interviewers with the interview protocol and procedures. Interviewers were given an opportunity to conduct mock interviews until they felt comfortable with the questions. During these interviews, the Macro trainer answered questions and provided feedback to each interviewer.

Fielding of Study

The study was fielded over a period of five weeks in March and April 2008. Over that time, 1032 consumers were interviewed in five locations. The five locations—Baltimore, MD, Dallas, TX, Detroit, MI, Los Angeles, CA, and Springfield, MA—were selected because of their geographic and demographic diversity. Participation was limited to individuals who were literate in English and who were not an employee of a bank, savings and loan, credit union, or investment firm. Recruiting quotas were used in each location to ensure a representative mix of respondents in terms of gender, age, and educational level. Appendix B lists the demographics of respondents in each location.

Quality Assurance Procedures

Macro built into its methodology a number of strategies to ensure that the data that were collected were accurate and reliable. Some of these included the following:

- Participants were “double-screened” to ensure that they met the study requirements. After being told that they qualified for the study based a series of questions on the mall floor, participants were asked the screening questions again when the survey began. In most cases, these questions were asked by a different interviewer than the one that had initially screened them. If participants’ responses varied at all, they were not allowed to complete the survey.
- The organization responsible for the day-to-day operation of the interview facilities conducted phone verification of 10 percent of completed interviews. Participants were contacted by phone within 48 hours of their interviews, and asked the screening questions a third time. If their responses varied at all from their original answers, their interview was removed from the database.
- The online survey instrument included a series of “checks” to make sure that interviewers were showing respondents the correct notice. Each time they were handed a new document, respondents were asked to read an alphanumeric code that was on the bottom-right corner. The interviewer then typed this code into the survey instrument. If the code was not correct, the interviewer was notified by the survey programming that he or she was using the wrong notice, and the interview was immediately terminated.
- As noted above, facility directors participated in all training conducted by Macro staff. Throughout the fielding process, directors then took an active role in verifying that all interviewers were following the survey protocol exactly.

- Macro research staff downloaded and reviewed the survey data on a daily basis. In situations when a facility appeared to be in danger of missing its respondent quotas, Macro contacted the facility to inquire. Macro staff also reviewed the data for patterns indicating that one or more interviewers were not following the study protocols carefully; however, no such patterns appeared during fielding.³

Confidentiality of Participant Data

When the study was being designed, an important consideration for both Macro and the Agencies was that any personal information collected from participants was kept secure. When the interview was conducted, participants were asked to provide their name and phone number for the purposes of the verification interviews described above. Participants were informed that these data would be used for this purpose. These data were recorded only on paper (not online), and were secured within the facility in which they were collected. All names and phone numbers of participants were destroyed within 48 hours after data collection was completed.

Final Deliverables

After data collection was complete and open-ended responses had been coded, Macro submitted to the Agencies a complete dataset containing all survey and screening data, as well as information about which notices had been shown to each participant. Macro also provided a comprehensive codebook that explained each variable, as well as all possible response options.

³ One pattern that did appear in the data was an unusual number of “Other” responses to question 33: “According to this notice, how could you tell this bank that you want to limit or opt out of the sharing of your information?” By analyzing responses to this question and discussing the pattern with interviewers, Macro determined that a large percentage of these “Other” responses were participants who indicated that they would check a box at the end of the notice to indicate to the bank that they wanted to limit or opt out of sharing. Evidence for this explanation is that only some of the notices included these check boxes, and participants were much more likely to give an “Other” response to question 33 when looking at these notices.

Appendix A:
Final Interview Protocol

Notes about Interview Protocol:

- As described in this report, each participant was given three different privacy notices to review and respond to during the course of the interview. These three notices were for three different fictional banks: Mars Bank, Mercury Bank, and Neptune Bank. The order in which each respondent received these notices was randomized through the survey programming. Therefore, whenever one of these banks is referred to in this protocol, it is referred to as “_____ Bank”. When interviewers were actually using this protocol, these blanks were automatically filled in with the names of the banks.
- At points in this protocol, the item numbers are not consecutive. This is because several items in the instrument were not actually questions to respondents, but were underlying elements of the survey programming. These items have not been included here, to avoid possible confusion.

1) Interview Location:

- Baltimore
- Dallas
- Detroit
- Los Angeles
- Springfield
- Macro

2) Interviewer's Initials (Example: ES):

3) Do you read and speak English fluently?

- Yes
- No [POLITELY EXCUSE RESPONDENT]

4) Are you a current employee of a bank, savings and loan, credit union, or investment firm?

- Yes [POLITELY EXCUSE RESPONDENT]
- No

5) Gender

- Male
- Female

6) Which of the following categories best describes your age?

- 18-34
- 35-54
- 55 and over

7) What is the highest level of education you have completed?

- Less than high school
- High school graduate or G.E.D.
- Some college or post-secondary work
- College graduate
- Postgraduate work

INTERVIEWER READS: “Today we want to get your reactions to notices that you might get from a financial institution, like a bank, mortgage company, credit card company, or credit union that you do business with. Usually you get these notices in the mail from a company you already know, but today we are going to show you some examples of notices that we have created for fictional companies. We want to learn how easy these notices are to understand and use.

The whole interview should take about 15 to 20 minutes. Let’s get started.”

INTERVIEWER DIRECTIONS: Give the notice labeled _____ Bank to the participant.

INTERVIEWER READS: “Here is a notice for a bank. Please look at the bottom-right hand corner of this notice, and read me the letter and number that appear after the word "Form.””

8) Enter code provided by participant:

[If code is correct, interview continues; if code is incorrect, interview is aborted.]

INTERVIEWER READS: “Now I am going to give you a couple of minutes to read this notice. Make sure you look at each page of the notice, including front and back. I will then ask you some questions. You will be able to use the notice when answering them.”

[After participant is done reading, interview continues; participants are given a maximum of 4 minutes to read the notice.]

9) In one or two sentences, what is the main point of this notice? [Record verbatim response]

INTERVIEWER DIRECTIONS: Give the notice labeled _____ Bank to the participant.

INTERVIEWER READS: “Here is a notice for a different bank. Again, I am going to give you a couple of minutes to read it. Make sure you look at each page of the notice, including front and back. I will then ask you some questions. You will be able to use the notice when answering them.”

[After participant is done reading, interview continues; participants are given a maximum of 4 minutes to read the notice.]

INTERVIEWER DIRECTIONS: Pick up the two notices that the participant has read, and hand them to the participant.

INTERVIEWER READS: “Now I’m going to ask you some questions comparing these two banks. You can look at both notices when answering these questions.”

13) I want you to assume that these two banks are offering you identical products, services, and interest rates. Based on what you see in the notices, which one would you select to be your bank? [Do not read response options]

- Would select _____ Bank
- Would select _____ Bank
- No preference--both banks are similar
- Not sure

16a) (If Q13 = d) Why aren't you sure which bank you would select? [Record verbatim responses.]

16b) (If Q13 = c) Why do you say the banks are similar? [Record verbatim responses]

16c) (If Q13 = a or b) Why do you prefer the bank that you chose? [Record verbatim responses.]

**INTERVIEWER READS: “Now I’m going to ask you some questions about how much personal information these two banks collect and how much they share with others.”
Let me start first with the collection of personal information by the banks.**

17) Does one of these banks collect more personal information about you than the other bank, or do they both collect the same amount of personal information?

- Both collect the same amount of personal information
- _____ Bank collects more information
- _____ Bank collects more information
- Not sure

18) Does one of these banks share your personal information with others more than the other bank, or do they both share your personal information equally?

- Both share equally
- _____ Bank shares more information
- _____ Bank shares more information
- Not sure

19) Which of these two banks gives you the opportunity to limit or to opt out of the sharing of your personal information? Is it _____ Bank only, _____ Bank only, both, or neither?

- _____ Bank only
- _____ Bank only
- Both
- Neither
- Not sure

20) Assume you have limited or opted out of all the possible sharing that you can for both banks. Once you have done this, would one of these banks share your personal information more than the other bank, or would they both share your personal information equally?

- Both would share equally
- _____ Bank would share more information
- _____ Bank would share more information
- Not sure

INTERVIEWER DIRECTIONS:

#1: TAKE BACK the notice labeled _____ Bank.

#2: GIVE the participant the notice labeled _____ Bank.

INTERVIEWER READS: “Here is a notice for a third bank. Please look at the bottom-right hand corner of this notice, and again read me the letter and number that appear after the word "Form.””

21) Enter code provided by participant:

[If code is correct, interview continues; if code is incorrect, interview is aborted.]

INTERVIEWER READS: “Again, I'm going to give you a couple of minutes to read this notice. Make sure you look at each page of the notice, including front and back. I will then ask you some questions. You will be able to use the notice when answering them.”

[After participant is done reading, interview continues; participants are given a maximum of 4 minutes to read the notice.]

INTERVIEWER DIRECTIONS: Pick up the notices for _____ Bank and _____ Bank, and hand them to the participant.

INTERVIEWER READS: “Now I'm going to ask you some questions comparing these two banks. You can look at both notices when answering these questions.”

24) I want you to assume that these two banks are offering you identical products, services, and interest rates. Based on what you see in the notices, which one would you select to be your bank? (Do not read response options)

- Would prefer _____ Bank
- Would prefer _____ Bank
- No preference--both banks are similar
- Not sure

27a) (If Q24=d) Why aren't you sure which bank you would select? [Record verbatim responses.]

27b) (If Q24=c) Why do you say the banks are similar? [Record verbatim responses.]

27c) (If Q24=a or b) Why do you prefer the bank you chose? [Record verbatim responses.]

**INTERVIEWER READS: “Now I’m going to ask you some questions about how much personal information these two banks collect and how much they share with others.”
Let me start first with the collection of personal information by the banks.**

28) Does one of these banks collect more personal information about you than the other bank, or do they both collect the same amount of personal information?

- Both collect the same amount of personal information
- _____ Bank collects more information
- _____ Bank collects more information
- Not sure

29) Does one of these banks share your personal information with others more than the other bank, or do they both share your personal information equally?

- Both share equally
- _____ Bank shares more information
- _____ Bank shares more information
- Not sure

30) Which of these two banks gives you the opportunity to limit or to opt out of the sharing of your personal information? Is it _____ Bank only, _____ Bank only, both or neither?

- _____ Bank only
- _____ Bank only
- Both
- Neither
- Not sure

31) Assume you have limited or opted out of all the possible sharing that you can for both banks. Once you have done this, would one of these banks share your personal information more than the other bank, or would they both share your personal information equally?

- Both would share equally
- _____ Bank would share more information
- _____ Bank would share more information
- Not sure

INTERVIEWER DIRECTIONS: TAKE BACK the notice labeled _____ Bank. At this point, the participant should ONLY have the notice labeled _____ Bank.

INTERVIEWER READS: "I have one more question about _____ Bank."

32) Does this notice say how you could tell _____ Bank that you want to limit or opt out of the sharing of your information?

- Yes
- No
- Not sure

33) (If Q32 = Yes) According to this notice, how could you tell _____ Bank that you want to limit or opt out of the sharing of your information?

INTERVIEWER DIRECTIONS: Do not read response options; check off all that participant mentions. If participant provides responses that are not on the list, check "Other". Before moving to the next question, prompt participant: "Are there any other ways that you could limit or opt out of sharing?"

- Call the bank at the phone number listed
- Go online to the bank's website
- Write to the bank
- Don't know
- _____ Bank does not offer any way to limit or opt out of sharing
- Other

INTERVIEWER DIRECTIONS: Take out the laminated card with the 1 to 5 agreement scale, and show it to the participant.

34) Using the scale shown on this card, where 5 is strongly agree and 1 is strongly disagree, tell me how much you agree or disagree with the following statement:

	1. Strongly disagree	2. Disagree	3. Neither agree nor disagree	4. Agree	5. Strongly agree
With this notice, it was easy to find out the ways that _____ Bank allows you to limit or opt out of sharing information.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

INTERVIEWER DIRECTIONS: TAKE BACK the notice labeled _____ Bank. For the rest of the interview, the participant should have NO NOTICES to look at. Keep the laminated card with the five agreement choices out, so the participant can see it.

INTERVIEWER READS: “Now, I’d like to ask you your opinions about the three notices you just read.”

35) Using the scale shown on this card, tell me how much you agree or disagree with each of the following statements:

	1. Strongly disagree	2. Disagree	3. Neither agree nor disagree	4. Agree	5. Strongly agree
The notices were easy to read and understand.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The notices made it easy to compare the sharing practices of the different banks.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
It was easy to find the information I needed for most questions.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

INTERVIEWER READS: “Now I’d like to ask what you think about some of the practices of banks in general.”

36) Using the scale shown on this card, tell me how much you agree or disagree with each of the following statements:

	1. Strongly disagree	2. Disagree	3. Neither agree nor disagree	4. Agree	5. Strongly agree
Most banks share their customers’ personal information in very similar ways.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

I like banks to share my personal information with nonaffiliates--that is, other companies that are not a part of the bank--because then these companies can offer me additional products and services that I might want or need.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
I like banks to share my personal information with affiliates--that is, other companies that are a part of the bank--because then these companies can offer me additional products and services that I might want or need.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

INTERVIEWER READS: “I have just a few additional questions to ask about you.”

Codes for Race/Ethnicity Responses:

- 1 = White (including Middle Eastern or Arab)*
- 2 = Black/African-American*
- 3 = Hispanic/Latino*
- 4 = Asian*
- 5 = American Indian/Alaska Native*
- 6 = Native Hawaiian/Pacific Islander*
- 7 = Other*
- 9 = No response*

37) Which category or categories in this list do you feel best describe you? You can select more than one.

First response: _____

Second response: _____

Third response: _____

38) Do you currently have an account with a bank, savings and loan, credit union, or investment firm? (Do not read response options)

- Yes
- No
- Don't know/No response

[If Q38=Yes, skip to Q40]

39) Do you regularly use a check cashing service or pay day lender? (Do not read response options)

- Yes
- No
- Don't know/No response

40) Including yourself, how many people live in your household? (Do not read response options)

- 1
- 2-3
- 4+
- No response

41) Which of these categories best describes your annual combined household income?

- 1) Under \$25,000
- 2) \$25,000 - \$50,000
- 3) \$50,000 - \$75,000
- 4) \$75,000 - \$100,000
- 5) Over \$100,000
- No response

Appendix B:
Summary of Participant
Characteristics

	Baltimore, MD	Dallas, TX	Detroit, MI	Los Angeles, CA	Springfield, MA	TOTAL
Total Participants	212	202	209	204	205	1032
Gender¹						
Male	109 (51%)	103 (51%)	95 (45%)	103 (51%)	101 (49%)	511 (50%)
Female	103 (49%)	99 (49%)	114 (55%)	101 (49%)	104 (51%)	521 (50%)
Age						
18-34	82 (39%)	79 (39%)	73 (35%)	74 (36%)	66 (32%)	374 (36%)
35-54	81 (38%)	75 (37%)	86 (41%)	81 (40%)	85 (42%)	408 (40%)
55+	49 (23%)	48 (24%)	50 (24%)	49 (24%)	54 (26%)	250 (24%)
Highest Level of Education						
Less than high school	39 (18%)	34 (17%)	41 (20%)	40 (19%)	41 (20%)	185 (18%)
High school graduate or G.E.D.	52 (25%)	79 (39%)	77 (37%)	89 (42%)	133 (65%)	430 (42%)
Some college or post-secondary work	57 (27%)	47 (23%)	66 (32%)	61 (29%)	19 (9%)	250 (24%)
College graduate	52 (25%)	36 (18%)	22 (11%)	20 (9%)	12 (6%)	142 (14%)
Postgraduate work	12 (6%)	6 (3%)	3 (1%)	4 (2%)	0 (0%)	25 (2%)
Race/Ethnicity²						
White (including Middle Eastern or Arab)	137 (65%)	92 (46%)	108 (52%)	81 (40%)	116 (57%)	534 (52%)
Black/African-American	50 (24%)	79 (39%)	100 (48%)	27 (13%)	48 (23%)	304 (29%)
Hispanic/Latino	22 (10%)	38 (19%)	6 (3%)	118 (58%)	42 (20%)	226 (22%)
Asian	15 (7%)	2 (1%)	3 (1%)	5 (2%)	1 (<1%)	26 (3%)
American Indian/Alaska Native	3 (1%)	2 (1%)	2 (1%)	11 (5%)	3 (1%)	21 (2%)
Native Hawaiian/Pacific Islander	0 (0%)	0 (0%)	1 (<1%)	4 (2%)	2 (1%)	7 (1%)
Other	1 (<1%)	3 (1%)	5 (2%)	8 (4%)	8 (4%)	25 (2%)
No response	3 (1%)	0 (0%)	0 (0%)	26 (13%)	1 (<1%)	30 (3%)
Number of People in Household						
1	28 (13%)	59 (29%)	57 (27%)	19 (9%)	38 (19%)	201 (19%)
2-3	135 (64%)	95 (47%)	110 (53%)	94 (46%)	114 (56%)	548 (53%)
4+	45 (21%)	46 (23%)	42 (20%)	91 (45%)	53 (26%)	277 (27%)
No response	4 (2%)	2 (1%)	0 (0%)	0 (0%)	0 (0%)	6 (1%)

¹ Information about gender, age, and education level was collected during the screening process. Information about race/ethnicity, household size, and income was collected through questions at the end of the survey.

² Because participants were given the opportunity to self-identify with up to three of the ethnic categories shown, these figures may add up to more than 100%.

	Baltimore, MD	Dallas, TX	Detroit, MI	Los Angeles, CA	Springfield, MA	TOTAL
Household Income						
Under \$25K	6 (3%)	41 (20%)	75 (36%)	50 (25%)	47 (23%)	219 (21%)
\$25K to \$50K	58 (27%)	67 (33%)	70 (33%)	60 (29%)	68 (33%)	323 (31%)
\$50K to \$75K	86 (41%)	61 (30%)	45 (22%)	49 (24%)	52 (25%)	293 (28%)
\$75K to \$100K	43 (20%)	18 (9%)	11 (5%)	19 (9%)	12 (6%)	103 (10%)
Over \$100K	8 (4%)	9 (4%)	6 (3%)	12 (6%)	4 (2%)	39 (4%)
No response	11 (5%)	6 (3%)	2 (1%)	14 (7%)	22 (11%)	55 (5%)

Appendix C:

Model Privacy Notices Used In Testing

Note: A total of 12 notices were used in this study. The notices were coded as A1, A2, A3, B1, B2, B3, C1, C2, C3, D1, D2, and D3; the code can be found in the bottom-right hand corner of each page. The letter in each code refers to the style of the notice, while the number refers to the fictional bank whose privacy policy is described (Mercury Bank, Mars Bank, or Neptune Bank).

F A C T S

WHAT DOES MARS BANK DO WITH YOUR PERSONAL INFORMATION?

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.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- account balances and payment history
- credit history and credit scores

When you are no longer our customer, we continue to share information about you as described in this notice.

How?

All financial companies need to share customers' personal information to run their everyday business—such as to process transactions, maintain customer accounts, respond to court orders and legal investigations, and report to credit bureaus. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Mars Bank chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Mars Bank share?	Can you limit this sharing?
For our everyday business purposes— to process your transactions, maintain your account, and report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
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 creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For nonaffiliates to market to you	No	We don't share

Contact Us

Call 1-800-898-9696 or go to www.marsbankco.com/privacy

F A C T S

WHAT DOES MARS BANK DO WITH YOUR PERSONAL INFORMATION?

Who we are

Who is providing this notice?

Mars Bank is providing this notice to our customers.

Sharing practices

How often does Mars Bank notify me about its practices?

We must notify you about our sharing practices when you open an account and each year while you are a customer.

How does Mars Bank protect my personal information?

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.

How does Mars Bank collect my personal information?

We collect your personal information, for example, when you

- open an account or deposit money
- pay your bills or apply for a loan
- use your credit or debit card

We also collect your personal information from others, such as credit bureaus or other companies.

Why can't I limit all sharing?

Federal law gives you the right to limit

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- ***Mars Bank has no affiliates.***

Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- ***Mars Bank does not share with nonaffiliates so they can market to you.***

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- ***Mars Bank doesn't jointly market.***

F A C T S

WHAT DOES MERCURY BANK DO WITH YOUR PERSONAL INFORMATION?

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.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- account balances and payment history
- credit history and credit scores

When you are no longer our customer, we continue to share information about you as described in this notice.

How?

All financial companies need to share customers' personal information to run their everyday business—such as to process transactions, maintain customer accounts, respond to court orders and legal investigations, and report to credit bureaus. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Mercury Bank chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Mercury Bank share?	Can you limit this sharing?
For our everyday business purposes— to process your transactions, maintain your account, and report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes— information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes— information about your creditworthiness	Yes	Yes (Check your choice, p.3)
For our affiliates to market to you	No	We don't share
For nonaffiliates to market to you	No	We don't share

Contact Us

Call 1-800-631-8844 or go to www.mercurybankco.com/privacy

WHAT DOES MERCURY BANK DO WITH YOUR PERSONAL INFORMATION?

Who we are

<p>Who is providing this notice?</p>	<p>Mercury Bank is providing this notice for itself and for its affiliates, Mercury Investment, Sun Insurance, and Moon Marketing Agency.</p>
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Sharing practices

<p>How often does Mercury Bank notify me about its practices?</p>	<p>We must notify you about our sharing practices when you open an account and each year while you are a customer.</p>
<p>How does Mercury Bank protect my personal information?</p>	<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>How does Mercury Bank collect my personal information?</p>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> ■ open an account or deposit money ■ pay your bills or apply for a loan ■ use your credit or debit card <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
<p>Why can't I limit all sharing?</p>	<p>Federal law gives you the right to limit</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 ■ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>

Definitions

<p>Affiliates</p>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>Our affiliates include companies with a Mercury name; financial companies, such as Sun Insurance; and nonfinancial companies, such as Moon Marketing Agency.</i>
<p>Nonaffiliates</p>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>Mercury Bank does not share with nonaffiliates so they can market to you.</i>
<p>Joint marketing</p>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ■ <i>Mercury Bank doesn't jointly market.</i>

F A C T S

WHAT DOES MERCURY BANK DO WITH YOUR PERSONAL INFORMATION?

If you want to limit our sharing

Contact us

By telephone: 1-800-631-7654 — our menu will prompt you through your choices

On the web: www.mercurybankco.com/privacy

If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice to you. However, you can contact us at any time to limit our sharing.

Check your choice

Your choice will apply to everyone on your account.

Check if you want to limit: *(See page 1)*

- Do not share information about my creditworthiness with your affiliates for their everyday business purposes.

F A C T S

WHAT DOES NEPTUNE BANK DO WITH YOUR PERSONAL INFORMATION?

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.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- account balances and payment history
- credit history and credit scores

When you are no longer our customer, we continue to share information about you as described in this notice.

How?

All financial companies need to share customers' personal information to run their everyday business—such as to process transactions, maintain customer accounts, respond to court orders and legal investigations, and report to credit bureaus. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Neptune Bank chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Neptune Bank share?	Can you limit this sharing?
For our everyday business purposes— to process your transactions, maintain your account, and report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes— information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes— information about your creditworthiness	Yes	Yes (Check your choices, p.3)
For our affiliates to market to you	Yes	Yes (Check your choices, p.3)
For nonaffiliates to market to you	Yes	Yes (Check your choices, p.3)

Contact Us

Call 1-800-543-2828 or go to www.neptunebankco.com/privacy

F A C T S

WHAT DOES NEPTUNE BANK DO WITH YOUR PERSONAL INFORMATION?

Who we are

<p>Who is providing this notice?</p>	<p>Neptune Bank is providing this notice for itself and for its affiliates, Neptune Mortgage Company, Orion Insurance, and Saturn Marketing Agency.</p>
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Sharing practices

<p>How often does Neptune Bank notify me about its practices?</p>	<p>We must notify you about our sharing practices when you open an account and each year while you are a customer.</p>
<p>How does Neptune Bank protect my personal information?</p>	<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>How does Neptune Bank collect my personal information?</p>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> ■ open an account or deposit money ■ pay your bills or apply for a loan ■ use your credit or debit card <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
<p>Why can't I limit all sharing?</p>	<p>Federal law gives you the right to limit</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 ■ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>

Definitions

<p>Affiliates</p>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>Our affiliates include companies with a Neptune name; financial companies, such as Orion Insurance; and nonfinancial companies, such as Saturn Marketing Agency.</i>
<p>Nonaffiliates</p>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>Nonaffiliates we share with can include mortgage companies, insurance companies, direct marketing companies, and nonprofit organizations.</i>
<p>Joint marketing</p>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ■ <i>Our joint marketing partners include credit card companies.</i>

If you want to limit our sharing

Contact us

By telephone: 1-800-543-7879 — our menu will prompt you through your choices
 On the web: www.neptunebankco.com/privacy

If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice to you. However, you can contact us at any time to limit our sharing.

Check your choices

Your choices will apply to everyone on your account.

Check any/all you want to limit: *(See page 1)*

- Do not share information about my creditworthiness with your affiliates for their everyday business purposes.
- Do not allow your affiliates to use my personal information to market to me. *(After 5 years, I can renew my choice when you send me a renewal notice.)*
- Do not share my personal information with nonaffiliates to market their products and services to me.

F A C T S

WHAT DOES MARS BANK DO WITH YOUR PERSONAL INFORMATION?

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.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- account balances and payment history
- credit history and credit scores

When you are no longer our customer, we continue to share information about you as described in this notice.

How?

All financial companies need to share customers' personal information to run their everyday business—such as to process transactions, maintain customer accounts, respond to court orders and legal investigations, and report to credit bureaus. In the section below, we list how financial companies can share their customers' personal information; how Mars Bank chooses to share; and whether you can limit this sharing.

Can you limit?

You **cannot limit** our sharing for:

- our everyday business purposes
- our marketing purposes

We **do not share*** for:

- joint marketing with other financial companies
- affiliates' everyday business purposes—information about your transactions and experiences
- affiliates' everyday business purposes—information about your creditworthiness
- affiliates to market to you
- nonaffiliates to market to you

***You do not need to do anything because we do not share in these ways.**

Mars Bank has no affiliates.

Contact Us

Call 1-800-898-9696 or go to www.marsbankco.com/privacy

F A C T S

WHAT DOES MARS BANK DO WITH YOUR PERSONAL INFORMATION?

Who we are

Who is providing this notice?

Mars Bank is providing this notice to our customers.

Sharing practices

How often does Mars Bank notify me about its practices?

We must notify you about our sharing practices when you open an account and each year while you are a customer.

How does Mars Bank protect my personal information?

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.

How does Mars Bank collect my personal information?

We collect your personal information, for example, when you

- open an account or deposit money
- pay your bills or apply for a loan
- use your credit or debit card

We also collect your personal information from others, such as credit bureaus or other companies.

Why can't I limit all sharing?

Federal law gives you the right to limit

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- ***Mars Bank has no affiliates.***

Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- ***Mars Bank does not share with nonaffiliates so they can market to you.***

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- ***Mars Bank doesn't jointly market.***

F A C T S

WHAT DOES MERCURY BANK DO WITH YOUR PERSONAL INFORMATION?

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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- credit history and credit scores

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All financial companies need to share customers' personal information to run their everyday business—such as to process transactions, maintain customer accounts, respond to court orders and legal investigations, and report to credit bureaus. In the section below, we list how financial companies can share their customers' personal information; how Mercury Bank chooses to share; and whether you can limit this sharing.

Can you limit?

You **cannot limit** our sharing for:

- our everyday business purposes
- our marketing purposes
- our affiliates' everyday business purposes—information about your transactions and experiences

You **can limit*** our sharing for:

- our affiliates' everyday business purposes—information about your creditworthiness

We **do not**:

- share for joint marketing with other financial companies
- allow our affiliates to use your information to market to you
- share for nonaffiliates to market to you

***See page 3, "Check your choice," if you choose to limit this sharing.**

Contact Us

Call 1-800-631-8844 or go to www.mercurybankco.com/privacy

F A C T S

WHAT DOES MERCURY BANK DO WITH YOUR PERSONAL INFORMATION?

Who we are

<p>Who is providing this notice?</p>	<p>Mercury Bank is providing this notice for itself and for its affiliates, Mercury Investment, Sun Insurance, and Moon Marketing Agency.</p>
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Sharing practices

<p>How often does Mercury Bank notify me about its practices?</p>	<p>We must notify you about our sharing practices when you open an account and each year while you are a customer.</p>
<p>How does Mercury Bank protect my personal information?</p>	<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>How does Mercury Bank collect my personal information?</p>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> ■ open an account or deposit money ■ pay your bills or apply for a loan ■ use your credit or debit card <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
<p>Why can't I limit all sharing?</p>	<p>Federal law gives you the right to limit</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 ■ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>

Definitions

<p>Affiliates</p>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>Our affiliates include companies with a Mercury name; financial companies, such as Sun Insurance; and nonfinancial companies, such as Moon Marketing Agency.</i>
<p>Nonaffiliates</p>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>Mercury Bank does not share with nonaffiliates so they can market to you.</i>
<p>Joint marketing</p>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ■ <i>Mercury Bank doesn't jointly market.</i>

F A C T S

WHAT DOES MERCURY BANK DO WITH YOUR PERSONAL INFORMATION?

If you want to limit our sharing

Contact us

By telephone: 1-800-631-7654 — our menu will prompt you through your choices

On the web: www.mercurybankco.com/privacy

If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice to you. However, you can contact us at any time to limit our sharing.

Check your choice

Your choice will apply to everyone on your account.

Check if you want to limit: *(See page 1)*

- Do not share information about my creditworthiness with your affiliates for their everyday business purposes.

F A C T S

WHAT DOES NEPTUNE BANK DO WITH YOUR PERSONAL INFORMATION?

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.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

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- account balances and payment history
- credit history and credit scores

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All financial companies need to share customers' personal information to run their everyday business—such as to process transactions, maintain customer accounts, respond to court orders and legal investigations, and report to credit bureaus. In the section below, we list how financial companies can share their customers' personal information; how Neptune Bank chooses to share; and whether you can limit this sharing.

Can you limit?

You **cannot limit** our sharing for:

- our everyday business purposes
- our marketing purposes
- joint marketing with other financial companies
- our affiliates' everyday business purposes—information about your transactions and experiences

You **can limit***:

- sharing for our affiliates' everyday business purposes—information about your creditworthiness
- our affiliates using your information to market to you
- sharing for nonaffiliates to market to you

***See page 3, "Check your choices," if you choose to limit this sharing.**

Contact Us

Call 1-800-543-2828 or go to www.neptunebankco.com/privacy

F A C T S

WHAT DOES NEPTUNE BANK DO WITH YOUR PERSONAL INFORMATION?

Who we are

<p>Who is providing this notice?</p>	<p>Neptune Bank is providing this notice for itself and for its affiliates, Neptune Mortgage Company, Orion Insurance, and Saturn Marketing Agency.</p>
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Sharing practices

<p>How often does Neptune Bank notify me about its practices?</p>	<p>We must notify you about our sharing practices when you open an account and each year while you are a customer.</p>
<p>How does Neptune Bank protect my personal information?</p>	<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>How does Neptune Bank collect my personal information?</p>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> ■ open an account or deposit money ■ pay your bills or apply for a loan ■ use your credit or debit card <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
<p>Why can't I limit all sharing?</p>	<p>Federal law gives you the right to limit</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 ■ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>

Definitions

<p>Affiliates</p>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>Our affiliates include companies with a Neptune name; financial companies, such as Orion Insurance; and nonfinancial companies, such as Saturn Marketing Agency.</i>
<p>Nonaffiliates</p>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>Nonaffiliates we share with can include mortgage companies, insurance companies, direct marketing companies, and nonprofit organizations.</i>
<p>Joint marketing</p>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ■ <i>Our joint marketing partners include credit card companies.</i>

F A C T S

WHAT DOES NEPTUNE BANK DO WITH YOUR PERSONAL INFORMATION?

If you want to limit our sharing

Contact us

By telephone: 1-800-543-7879 — our menu will prompt you through your choices
On the web: www.neptunebankco.com/privacy

If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice to you. However, you can contact us at any time to limit our sharing.

Check your choices

Your choices will apply to everyone on your account.

Check any/all you want to limit: *(See page 1)*

- Do not share information about my creditworthiness with your affiliates for their everyday business purposes.
- Do not allow your affiliates to use my personal information to market to me. *(After 5 years, I can renew my choice when you send me a renewal notice.)*
- Do not share my personal information with nonaffiliates to market their products and services to me.

For more than 100 years, the Mars Bank 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 responsive, professional service you deserve, and to protect your privacy and security along the way. This commitment forms the cornerstone of trust and confidence on which we hope to build long-lasting relationships with the customers we serve.

The Mars Bank Privacy Policy describes how we use and protect your customer information. We believe that protecting your privacy is an integral part of the customer service we provide to you. At Mars Bank, we value your relationship, and we work diligently every day to honor the trust you place in us. Thank you for banking with Mars Bank.

Highlights of Our Commitment To You

- Within Mars Bank, we safeguard your customer information carefully.
We carefully limit the sharing of your information solely to provide the products and services you request and to send you information about special offers that may interest you.
- We are committed to protecting your customer information in every transaction, at every level of our organization.
For this purpose, we have designed procedures, standards and technology, which are described in this notice.

How We Use Your Information

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; or
- Information we receive from an outside company, such as a credit bureau, regarding information about your creditworthiness.

We use and share information to provide quality service and to offer financial services that may be of value or interest to you. For example, your information enables us to:

- Serve your accounts and meet your financial needs;
- Protect your accounts from unauthorized access;
- Process your requests such as loan applications, purchases, and ATM withdrawals, and to service your accounts by issuing checks, ATM cards, and account statements;
- Respond to subpoenas, to credit bureaus, or provide information in other situations at your authorized request.

We may share the information we collect with certain nonaffiliated third parties who provide services directly for us, including:

- Companies that perform support services for us, such as data processors, computer services, or mailing companies.

Protecting Your Personal Information

We take a number of steps to protect the privacy of information about you. We keep information under physical, electronic, and procedural controls that comply with or exceed governmental standards. We authorize our employees, agents, and contractors to get information about you only when they need it to do their work. We require companies working for us to protect information.

This policy applies to both our current and former customers.

- **For more information about us,** go to www.marsbankco.com or contact us at 1-888-234-5678.

For more than 100 years, the Mercury Bank 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 responsive, professional service you deserve, and to protect your privacy and security along the way. This commitment forms the cornerstone of trust and confidence on which we hope to build long-lasting relationships with the customers we serve.

The Mercury Bank Privacy Policy describes how we use and protect your customer information. We believe that protecting your privacy is an integral part of the customer service we provide to you. At Mercury Bank, we value your relationship, and we work diligently every day to honor the trust you place in us. Thank you for banking with Mercury Bank.

Highlights of Our Commitment To You

- Within the Mercury Bank companies, we safeguard your customer information carefully. *You have a choice about how your information may be shared and used within Mercury Bank. We have made it easy to communicate your privacy preferences to us.*
- We are committed to protecting your customer information in every transaction, at every level of our organization. *For this purpose, we have designed procedures, standards and technology, which are described in this notice.*

How We Use Your Information

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 information about your creditworthiness; or
- Information about your transactions or experiences with companies affiliated with Mercury Bank.

We use and share information to provide quality service and to offer financial services that may be of value or interest to you. For example, your information enables us to:

- Serve your accounts and meet your financial needs;
- Protect your accounts from unauthorized access;
- Process your requests such as loan applications, purchases, and ATM withdrawals, and to service your accounts by issuing checks, ATM cards, and account statements;
- Respond to subpoenas, to credit bureaus, or provide information in other situations at your authorized request.

We share information among our affiliated companies so that we can work together to serve you, including:

- Our administrative and service units;
- Our affiliates, which provide financial and other services. These affiliates include consumer bankers, mortgage lenders, securities broker-dealers, insurance agencies, and real estate brokerage companies.

We may share the information we collect with nonaffiliated third parties.

- Companies that perform support services for us, such as data processors, computer services, or mailing companies.

Protecting Your Personal Information

We take a number of steps to protect the privacy of information about you. We keep information under physical, electronic, and procedural controls that comply with or exceed governmental standards. We authorize our employees, agents, and contractors to get information about you only when they need it to do their work. We require companies working for us to protect information.

This policy applies to both our current and former customers.

You Have a Choice at Mercury Bank

When we share personal information among our affiliated companies it can make it easier when you apply for accounts or services from these companies. In addition, sharing personal information can help you receive timely notice about products or services that may be of interest to you from our affiliated companies in the Mercury Bank family. For example, your personal information is used:

- To complete applications for new products or services that you request, thereby saving you time, and to manage our business and risks.
- To allow you to speak with a single customer service representative who has access to your information so that you will not have to speak to a representative from each affiliate. If you choose to restrict access to this information, you may need to give the same information multiple times for customer service and on applications for new products and services.

You have the right to limit how we share information about you.

- You may tell us not to share any information about your creditworthiness or credit eligibility among our affiliated companies.

If you choose to limit access to this information, it may take longer when you apply for new products or services from our affiliates.

If you wish to opt out of these disclosures, you may call our toll-free number at 1-888-333-5555 or visit our website at www.mercurybankco.com/privacy. We will ask you to verify your identity and the specific accounts to which your opt-out applies. Please have your account or reference numbers available when you call.

If you are satisfied with the current level of information you receive, you do not need to change your solicitation preference at this time. If you choose not to hear from us, you may not be notified about new services that may benefit you. You may always change your instructions at any time in the future by calling 1-888-333-5555 or visit our website at www.mercurybankco.com/privacy.

If you have already recorded your privacy preferences with us, there is no need to do so again.

For more than 100 years, the Neptune Bank 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 responsive, professional service you deserve, and to protect your privacy and security along the way. This commitment forms the cornerstone of trust and confidence on which we hope to build long-lasting relationships with the customers we serve.

The Neptune Bank Privacy Policy describes how we use and protect your customer information. We believe that protecting your privacy is an integral part of the customer service we provide to you. At Neptune Bank, we value your relationship, and we work diligently every day to honor the trust you place in us. Thank you for banking with Neptune Bank.

Highlights of Our Commitment To You

- Within the Neptune Bank companies, we safeguard your customer information carefully. *You have a choice about how your information may be shared and used within Neptune Bank. We have made it easy to communicate your privacy preferences to us.*
- We are committed to protecting your customer information in every transaction, at every level of our organization. *For this purpose, we have designed procedures, standards and technology, which are described in this notice.*

How We Use Your Information

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 information about your creditworthiness; or
- Information about your transactions or experiences with companies affiliated with Neptune Bank.

We use and share information to provide quality service and to offer financial services that may be of value or interest to you. For example, your information enables us to:

- Serve your accounts and meet your financial needs;
- Protect your accounts from unauthorized access;
- Process your requests such as loan applications, purchases, and ATM withdrawals, and to service your accounts by issuing checks, ATM cards, and account statements;
- Respond to subpoenas, to credit bureaus, or provide information in other situations at your authorized request.

We share information among our affiliated companies so that we can work together to serve you, including:

- Our administrative and service units;
- Our affiliates, which provide financial and other services, for their direct marketing purposes unless you instruct us otherwise. These affiliates include consumer bankers, mortgage lenders, securities broker-dealers, insurance agencies, and real estate brokerage companies.

We may share the information we collect with nonaffiliated third parties, including:

- Companies acting on our behalf, such as companies that perform support services for us, or with selected companies we believe will be of interest to you so they can market their products and services to you.

Protecting Your Personal Information

We take a number of steps to protect the privacy of information about you. We keep information under physical, electronic, and procedural controls that comply with or exceed governmental standards. We authorize our employees, agents, and contractors to get information about you only when they need it to do their work. We require companies working for us to protect information.

This policy applies to both our current and former customers.

You Have a Choice at Neptune Bank

When we share personal information among our affiliated companies it can make it easier when you apply for accounts or services from these companies. In addition, sharing personal information can help you receive timely notice about products, services or other special offers that may be of interest to you from our affiliated companies in the Neptune Bank family or from nonaffiliated third parties. For example, your personal information is used:

- To complete applications for new products or services that you request, thereby saving you time, and to manage our business and risks.
- To allow you to speak with a single customer service representative who has access to your information so that you will not have to speak to a representative from each affiliate. If you choose to restrict access to this information, you may need to give the same information multiple times for customer service and on applications for new products and services.
- To introduce you to our affiliated companies that offer specialized products or services which may be of benefit to you.
- To extend special offers and discounts to you from selected companies based on our knowledge of your total relationship with us.

You have the right to limit how we share information about you.

- You may tell us not to share any information about your creditworthiness or credit eligibility among our affiliated companies.
- You may tell us not to allow your personal information to be used by our affiliated companies for their marketing purposes.
- You may tell us not to share personal information about you with nonaffiliated third parties, except we may disclose information as required or permitted by law.

If you choose to limit access to this information, you may not receive timely notices about special offers that may be of interest to you.

If you wish to opt out of these disclosures, you may call our toll-free number at 1-888-654-7777 or visit our website at www.neptunebankco.com/privacy. We will ask you to verify your identity and the specific accounts to which your opt-out applies. Please have your account or reference numbers available when you call.

If you are satisfied with the current level of information you receive, you do not need to change your solicitation preference at this time. If you choose not to hear from us, you may not be notified about new services that may benefit you. You may always change your instructions at any time in the future by calling 1-888-654-7777 or visit our website at www.neptunebankco.com/privacy.

If you have already recorded your privacy preferences with us, there is no need to do so again.

Information That We Collect From You

We collect nonpublic personal information about you from the following sources:

- Information we receive from you on applications or other forms, such as your name, address, Social Security number, assets, and income;
- Information about your transactions with us or others, such as your account balance, payment history, parties to transactions, and credit card usage; and
- Information we receive from a consumer reporting agency, such as your creditworthiness and credit history.

Information We Disclose

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law.

This policy applies to both our customers and former customers.

Protecting Nonpublic Personal Information

We restrict access to nonpublic personal information about you to those employees who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.

- **For more information about us**, go to www.marsbankco.com or contact us at 1-888-777-8899.

Information That We Collect From You

We collect nonpublic personal information about you from the following sources:

- Information we receive from you on applications or other forms, such as your name, address, Social Security number, assets, and income;
- Information about your transactions with us, our affiliates, or others, such as your account balance, payment history, parties to transactions, and credit card usage; and
- Information we receive from a consumer reporting agency, such as your creditworthiness and credit history.

Information We Disclose

We may disclose all of the information that we collect, as described above. We may disclose nonpublic personal information we collect about you to companies that are affiliated with us. Our affiliates include companies using the Mercury name and other financial and nonfinancial companies such as credit card, consumer finance, insurance, and securities companies and retailers.

We may also disclose nonpublic personal information about you to nonaffiliated third parties as permitted by law. We may disclose all of the information we collect, as described above, to companies that perform marketing services on our behalf.

This policy applies to both our customers and former customers.

Opt-Out Choice

If you prefer that we not disclose information about your creditworthiness to our affiliates, you may opt out of those disclosures, that is, you may direct us not to make those disclosures (other than disclosures permitted by law). If you wish to opt out of disclosures of information about your creditworthiness to our affiliates, you may call the following toll-free number: 1-888-232-2020 or go to our website, www.mercurybankco.com/privacy.

Protecting Nonpublic Personal Information

We restrict access to nonpublic personal information about you to those employees who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.

Information That We Collect From You

We collect nonpublic personal information about you from the following sources:

- Information we receive from you on applications or other forms, such as your name, address, Social Security number, assets, and income;
- Information about your transactions with us, our affiliates, or others, such as your account balance, payment history, parties to transactions, and credit card usage; and
- Information we receive from a consumer reporting agency, such as your creditworthiness and credit history.

Information We Disclose

We may disclose all of the information that we collect, as described above. We may disclose nonpublic personal information we collect about you to companies that are affiliated with us. Our affiliates include companies using the Neptune name and other financial and nonfinancial companies such as credit card, consumer finance, insurance, and securities companies and retailers.

We may also disclose nonpublic personal information about you to nonaffiliated third parties as permitted by law. We may disclose all of the information we collect, as described above, to companies that perform marketing services on our behalf or to other financial institutions with whom we have joint marketing agreements.

We may also disclose nonpublic personal information about you to the following types of third parties:

- Financial service providers, such as mortgage bankers, securities broker-dealers, and insurance agents;
- Non-financial companies, such as retailers, direct marketers, airlines, and publishers; and
- Others, such as non-profit organizations.

This policy applies to both our customers and former customers.

Opt-Out Choices

- If you prefer that we not disclose information about your creditworthiness to our affiliates, you may opt out of those disclosures, that is, you may direct us not to make those disclosures (other than disclosures permitted by law). If you wish to opt out of disclosures of information about your creditworthiness to our affiliates, you may call the following toll-free number: 1-888-344-1111 or go to our website, www.neptunebankco.com/privacy.
- If you prefer that our affiliates not use your nonpublic personal information for their marketing purposes, you may opt out of such uses, that is, you may direct that our affiliates not use your information for their marketing to you (other than where permitted by law). If you wish to opt out of the use of your nonpublic personal information for marketing by our affiliates, you may call the following toll-free number: 1-888-344-1111 or go to our website, www.neptunebankco.com/privacy.
- If you prefer that we not disclose nonpublic personal information about you to nonaffiliated third parties, you may opt out of those disclosures, that is, you may direct us not to make those disclosures (other than disclosures permitted by law). If you wish to opt out of disclosures to nonaffiliated third parties, you may call the following toll-free number: 1-888-344-1111 or go to our website, www.neptunebankco.com/privacy.

Protecting Nonpublic Personal Information

We restrict access to nonpublic personal information about you to those employees who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.