Privacy Notice

Facts	**What does Proponent do with your Personal Information?**

Why?

Financial Companies choose how they share your personal information. Federal law gives members 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 member, we continue to share your info as described in this notice.

How?

All financial companies need to share members' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their members' personal information; the reasons Proponent chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information.	Does Proponent share?	Can you limit this sharing?
For our everyday business purposes - such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or to 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	NO	N/A
For our affiliates to market to you	NO	N/A
For our non-affiliates to market to you	NO	N/A

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Who we are:	
Who is providing this service?	**Proponent**
What we do:	
How does Proponent 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. We require our employees to protect the privacy of information about our members and of what medium is used to fulfill your request.
How does Proponent 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, affiliates, or other companies.
Why can't I limit all sharing?	Federal law gives you the right to limit only > share for affiliates's everyday business purposes - information about your creditworthiness > affiliates from using your information to market to you > sharing for non-affiliates to market to you

DEFINITIONS

Affiliates
Companies related by common ownership or control. They can be financial and non-financial companies. Proponent does not have any related/affiliated companies at this time.

Non-Affiliates
Companies not related by common ownership or control. They can be financial or nonfinancial companies.

> Non-affiliates Proponent shares with may include but are not limited to companies that provide auto financing or leasing; insurance; direct marketing; credit card products and services and business lending services.

Joint Marketing
A formal agreement between non-affiliated financial companies that together market financial products or services to you.

> Our joint marketing partners include investment, insurance and other financial service companies.