PRIVACY POLICY EFFECTIVE JULY 2013



FFECTIVE JULY 2013		it's a privilege to serve you	
FACTS	What do First Republic Bank and its affiliates 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 Account balances Transaction history Credit history Assets and investment experience		
How?	All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal information; the reasons First Republic chooses to share; and whether you can limit this sharing.		
Reasons we can s	hare your personal information	Does First Republic share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus		Yes	No
For our general communications purposes— to facilitate mailing communications on our behalf		Yes	No
For joint marketing with other financial companies		No	We don't share
For First Republic affiliates' everyday business purposes— information about your transactions and experiences		Yes	No
For First Republic affiliates' everyday business purposes— information about your creditworthiness		Yes	Yes
For First Republic affiliates to market to you		Yes	Yes
For nonaffiliates to market to you		No	We don't share
To limit our sharing	Call Toll Free 1-877-888-1024 and our menu will prompt you through your choices. Please note: If you are a new customer, we can begin sharing your information 45 days from the date we provide this notice When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.		
Questions?	Call Toll Free 1-888-408-0288		

Who we are		
Who is providing this notice?	First Republic Bank and its First Republic Trust Company division; First Republic Trust Company of Delaware, LLC; First Republic Securities Company, LLC; First Republic Investment Management, Inc. and its Luminous Capital division.	
What we do		
How does First Republic 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 conduct periodic reviews of our computer systems, including security features. Additionally, our employees are required to acknowledge their responsibility to maintain the confidentiality of Customer Information.	
How does First Republic collect my personal information?	 We collect your personal information, for example, when you Open an account or apply for a loan Make deposits or withdrawals from your account Enter into an investment advisory contract Seek advice about your investments 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 Sharing information about your creditworthiness with affiliates for everyday business purposes Affiliates from using your information to market to you Sharing for nonaffiliates to market to you (<i>First Republic does not do this.</i>) State laws and individual companies may give you additional rights to limit sharing. See the "Other important information" section below for additional rights provided under state law. 	
What happens when I limit sharing for an account I hold jointly with someone else?	Each accountholder must opt out individually.	
Definitions		
Affiliates	Companies related by common ownership or control. Our affiliates are: First Republic Bank and its First Republic Trust Company division; First Republic Trust Company of Delaware, LLC; First Republic Securities Company, LLC and First Republic Investment Management, Inc. and its Luminous Capital division.	
Nonaffiliates	Companies not related by common ownership or control. First Republic 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.	

Other important information

California and Vermont law place additional limits on sharing information with our affiliates about residents of those states. **For California:** In accordance with California law, the Company shares information we collect with affiliates when a client consents to such sharing or the information is released in connection with a written agreement between the client and First Republic Securities Company or First Republic Investment Management for the sole purpose of providing products or services covered by such written agreement. We will not share information if a client with a California mailing address directs us not to share.

For Vermont: In accordance with Vermont law, we will not share information we collect with our affiliates, unless a client with a Vermont mailing address consents to such sharing.