

PRIVACY POLICY

Rev. January 2011

WHAT DOES CAPITOL NATIONAL BANK DO WITH YOUR PERSONAL



Need help growing your business?

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CHECK IT OUT!

share your personal information. Federal law gives you the right to opt out of all sharing. Federal law also requires us to tell you how we use your personal information. Please read this notice carefully to understand

How the information we collect and share depend on the product or service you have

Income

- » Account Balances and Transaction history
- » Assets and Credit history

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

What?	<ul style="list-style-type: none"> » Account Balances and Transaction history » Assets and Credit history <p>When you are no longer our customer, we continue to share your information as described in this notice.</p>
How?	<p>All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Capitol National Bank chooses to share; and whether you can limit this sharing.</p>

Reasons we can share your personal information	Does Capitol National Bank share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes – to offer our products and services to you	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	We don't share
For nonaffiliates to market to you	No	We don't share

Questions?	Call (517) 316-0180 or go to www.capitolnational.com
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What We Do	
How does Capitol National Bank protect my personal information?	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.</p> <p>We restrict access to your personal information to our employees who need the information to properly service your account(s), act upon your requests, or to provide you products or services.</p>
How does Capitol National Bank collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> » open an account or 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</p>

	we also collect your personal information from others, such as credit bureaus, affiliates, or other companies.
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> ➤ sharing for affiliates' everyday business purposes – information about your creditworthiness ➤ affiliates from using your information to market to you ➤ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>

Definitions

Affiliates	<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 common ownership by Capitol Bancorp Limited. For a listing, please see "Our Affiliates" at www.capitolbancorp.com.</i>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ➤ <i>Capitol National Bank does not share with nonaffiliates so they can market to you.</i>
Joint Marketing	<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 partner(s) include a broker-dealer. However, no information, including contact information, is shared with this broker-dealer until we obtain your permission.</i>

Other important information

California Residents: Information sharing for the purpose of joint marketing, as described above, will not be done without first obtaining your written authorization.