

FACTS

WHAT DOES FOCUS BANK DO WITH YOUR PERSONAL INFORMATION?

Rev: 6/2013

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 Credit History
- * Account Balances and Transaction History
- * Assets and Income

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

How?

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 Focus Bank chooses to share; and whether you can limit sharing.

| Reasons we can share your personal information | Does Focus 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 | No | We don't share |
| For our affiliates' everyday business purposes - information your creditworthiness | No | We don't share |
| For nonaffiliates to market to you | No | We don't share |

Questions?

Call 1-800-464-3150 or go to www.focusbank.com

| Who we are | |
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| Who is providing this notice? | Focus Bank |
| What we do | |
| How does Focus 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 Focus Bank collect 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 * Apply for a Loan or Provide Employment Information * Give us your employment history <p>"We also collect your personal information from others, such as credit bureaus, affiliates, or other companies."</p> |
| 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 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 | |
| Affiliates | <p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <p><i>* Focus Bank does not share with our affiliates</i></p> |
| Nonaffiliates | <p>Companies not related by common ownership or control. They can be financial or nonfinancial companies.</p> <p><i>* Focus Bank does not share with nonaffiliates so they can market to you</i></p> |
| Joint Marketing | <p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <p><i>* Our joint marketing partners include insurance providers, debit card providers and identity theft prevention program providers.</i></p> |
| Other important information (If Any) | |
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