
PRIVACY NOTICE FAQ

1. When does a customer receive a Privacy Notice? The privacy notice VantageSouth sends to clients is the model disclosure form that is required by the Gramm-Leach-Bliley Act, which governs our privacy policy. We are required to provide an initial privacy notice at the time we establish a relationship with a client, and then an annual notice thereafter. A client also receives the notice each time they open a new account, as it prints as a standard disclosure with deposit account and loan account documentation. Notices are not required for business customers but are often provided during annual distribution due to the method in which we prepare account statements.
2. What Information Do We Collect? When a client requests products or services, we ask for information establishing their identity, such as your name, address, phone number, business phone number, email address, date of birth, social insurance number or social security number (for tax purposes), ID documentation details (passport, driver license) and employment.
3. What Information Do We Share? Under certain circumstances as outlined in the privacy notice provided to clients, their personal information may be shared with:
 - Companies with whom we have a joint marketing agreement
 - Third parties* with whom we use to service and/or market to clients
 - Affiliates of VantageSouth Bank (e.g. our holding company)

*Note: Third parties include vendors who process information for VantageSouth Bank in the course of servicing our client's account, such as check printers and data processing services. We only share client information with other third parties as indicated in the client's account agreement and under special circumstances such as responding to valid and authorized information requests from domestic and international authorities, complying with laws, regulations, subpoenas or court orders and for preventing fraud.

Applicable sections of VSB's Privacy Policy have been included below.

As a financial services provider, we place the highest value on the information we collect about customers. Customer information is the cornerstone on which we build trust and confidence in the relationships we establish and services we offer. To reaffirm our commitment to safeguarding our customer information, the Board of Directors of the Bank adopts the following Resolution:

BE IT RESOLVED that the following shall be the privacy policy of the Bank and shall apply to all future affiliates of the Bank:

1. We recognize and respect the privacy expectations of our customers and are committed to protecting the privacy of customer information.
2. We will utilize information integration among future affiliates of the Bank to the extent permitted by law in order to efficiently and effectively service and maintain our customer relationships, and to provide a broader array of financial products and services.
3. We will disclose customer information to unaffiliated third parties only as required or permitted by applicable law. However:
 - We will not sell our customer mailing lists or other customer information to outside marketing firms for the purpose of marketing non-financial products and services; and
 - We will not use or disclose personally identifiable medical information for any purpose other than underwriting or administration of insurance accounts, policies, or claims, unless otherwise permitted or required by applicable law.
4. In furtherance of this policy, management shall:
 - Develop and implement appropriate policies and procedures consistent with this Resolution;
 - Develop and distribute such notices concerning our privacy policy and practices as may be required from time to time by applicable law; and
 - Develop and implement appropriate internal controls to promote compliance with this Resolution and applicable laws concerning privacy and regulatory guidelines concerning information security.