

## PRIVACY STATEMENT

The underlying function and purpose of **BANKCARS** is to provide Financial Institutions a single secure web based portal to access multiple databases of information and conduct a risk analysis of potential consumer or business customers. Its second function is to provide Financial Institutions the ability to quickly report accounts that are deemed high risk and have been closed by reason of fraud or default. This also includes the ability to remove the reporting of default accounts that have been resolved. **BANKCARS** third purpose is to provide Financial Institutions a resource to obtain, verify, and record information that identifies each person who opens an account.

### Compliance

**BANKCARS** services comply with the **Fair Credit Reporting Act (FCRA)**, 15 U.S.C. § 1681 et seq., which includes the amendments to the FCRA set forth in the **Consumer Credit Reporting Reform Act of 1996** (Public Law 104-208, the **Omnibus Consolidated Appropriations Act for Fiscal Year 1997**, Title II, Subtitle D, Chapter 1), **Section 311 of the Intelligence Authorization for Fiscal Year 1998** (Public Law 105-107), the **Consumer Reporting Employment Clarification Act of 1998** (Public Law 105-347), Section 506 of the **Gramm-Leach-Bliley Act** (Public Law 106-102), and Sections 358(g) and 505(c) of the **Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act of 2001 (USA PATRIOT Act)** (Public Law 107-56). Those Financial Institutions that elect to use the Customer Identification Program (CIP) and Office of Foreign Assets Control (OFAC) functions also partially meet the **Financial Recordkeeping and Reporting of Currency and Foreign Transactions Act of 1970** (31 U.S.C. 1051 et seq.) often referred to as "**The Bank Secrecy Act**" (BSA), which requires financial institutions to maintain appropriate records and file certain reports which have a high degree of usefulness in criminal, tax, or regulatory investigations or proceedings.

### Our Policy About Disclosing Customer Information Outside Of BANKCARS

**BANKCARS** does not disclose consumer information collected from your potential or current customers to third parties except as permitted or required by law. Negative information you provide on closed or fraud accounts will be shared with users of **BANKCARS** or **National Check Network (NCN)**. Data obtained will not be used to solicit any consumer. Exceptions for disclosing consumer information are described below. Since this is **BANKCARS'** policy, there is nothing you need to do to request us not to share customer information with such third parties.

### Exceptions

Exception examples of when customer information may be disclosed outside of **BANKCARS** are as follows:

- To consumer reporting agencies, if reporting negative information
- For fraud, security or risk control
- To help complete a transaction you initiate, including information requested to verify the existence or condition of an account
- To resolve disputes or inquiries you may have about your accounts
- With your consent or at your direction, which may be oral, in writing, by telephone, electronic or other means we recognize
- When disclosure is required by law, such as pursuant to court order, subpoena, legal process or government agency examination or investigation, or to protect or enforce our rights
- To companies that perform services for us in connection with your accounts, such as data processing and software companies and collection agencies
- As otherwise necessary to service your account, or as permitted or required by law.

### Correcting Errors In Information BANKCARS Shares With Consumer Reporting Agencies

If you believe any of the information **BANKCARS** shares with a consumer reporting agency is in error, please let us know. Write to us at: **BANKCARS**, P.O. Box 244, Cadillac, Michigan 49601-0244. Please provide us with your complete name, current address, phone number. You will also need to include your account number, type of account, and the specific item in dispute. You must tell us the reason you believe this information has been reported in error.

### Confidentiality And Security

Protecting customer information has always been important to us. Access to consumer information is limited to those persons who need to know that information. For example, access to consumer information is needed for internal security or fraud control, to meet Federal law requirements, or resolve questions or inquiries. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard customer information. **BANKCARS** has security measures in place to protect the loss, misuse and alteration of the information under our control. A state-of-the-art firewall separates our Web pages and Web data from unauthorized access. The information provided in the course of on-line transactions between our clients is received from and transmitted to our database secure servers from our secure servers. All transaction data is encrypted using 128 bit SSL encryption.