

FACTS

WHAT DOES EMIGRANT DIRECT 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 and income
- account balances and payment history
- credit history and credit scores

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 Emigrant Direct (“ED”) chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does ED share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	Yes
<b>For joint marketing with other financial companies</b>	No	We don’t share
<b>For our affiliates’ everyday business purposes—</b> information about your transactions and experiences	Yes	Yes
<b>For our affiliates’ everyday business purposes—</b> information about your creditworthiness	Yes	Yes
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For nonaffiliates to market to you</b>	No	We don’t share

To limit our sharing

- Visit us online EmigrantDirect.com and login to your account select the “My Profile” tab and scroll to the bottom of the page to the Privacy Policy” section to make your selection **or**

Please note:

If you are a *new* customer, we can begin sharing your information 30 days from the date we sent 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 800-836-1997or email CustomerService@EmigrantDirect.com

Who we are

Who is providing this notice?

Emigrant Direct, a division of Emigrant Bank offering certain banking products and services via the Internet. See the “Other important information” box, for additional institutions jointly providing this notice.

What we do

How does Emigrant Direct 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.

Furthermore, we maintain safeguards to protect customer privacy on our websites. Lastly, we carefully monitor our compliance with applicable laws and regulations and our internal security policies and procedures.

How does Emigrant Direct collect my personal information?

We collect your personal information, for example, when you

- open an account or deposit money
- apply for a loan or use your credit or debit card
- provide your mortgage information

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 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

State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.

What happens when I limit sharing for an account I hold jointly with someone else?

Your choices will apply to everyone on your account.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- *Our affiliates include companies with a common corporate identity of financial institution name Emigrant Bank.*

Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- *Emigrant Direct 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.

- *Emigrant Direct doesn't jointly market*

Other important information

**California:** Under California law, we will not share information we collect about you with companies outside of Emigrant Family, unless the law allows. For example, we may share information with your consent, to service your accounts. We will limit sharing among our companies to the extent required by California law.

**The Emigrant Family:** Emigrant Family offers consumer-related financial services and includes Emigrant Bank (providing a full range of banking products); Emigrant Mortgage a division of Emigrant Bank., (offering residential mortgage loans), Emigrant Mortgage Company, Inc. (offering mortgage loan servicing), Emigrant Funding Corporation (offering small balance commercial mortgage loans), Emigrant Agency, Inc. doing business as Emigrant Financial Services (featuring insurance, annuity, and mutual fund products), Personal Risk Management Solutions (a division of Emigrant Bank providing insurance advisory services), New York Private Bank and Trust (a division of Emigrant Bank offering private banking and trust services), Sarasota Private Trust Company (a subsidiary of Emigrant Bank offering wealth management and trust services), Cleveland Private Trust Company (a subsidiary of Emigrant Bank offering wealth management and trust services), Emigrant Direct, Dollar Savings Direct and My Savings Direct (each a division of Emigrant Bank offering certain banking products and services via the Internet), New York Private Finance (an affiliate of Emigrant Bank offering structured loans and financial advisory services to private clients), and Emigrant Bank Fine Art Finance (a subsidiary of Emigrant Bank offering loans secured by fine art and art advisory services).