

# Statement of Policy Regarding The Privacy of Consumer Financial Information

**Last updated: January 1, 2020**

In order to provide Financial Institutions with quality checks to be used in connection with personal, family or household checking accounts, we collect personal information about account holders from the Financial Institutions that comprise our customer base. This information includes, without limitation, the account holder's name, address, telephone number, Financial Institution account number and any other nonpublic personal information provided by the Financial Institution. We use this account holder information to produce checks by which funds may be efficiently drawn on the account holder's account with the Financial Institution and to generate other reports and services requested by the Financial Institutions.

We understand the importance of safeguarding this personal information and are committed to protecting and preserving its confidentiality and security. We will not disclose the personal information of any customer or account holder unless we are legally required or permitted to do so. Examples of permissible disclosures include, but are not limited to:

- Disclosures authorized or requested by the Financial Institution or account holder;
- Disclosures required to facilitate a genuine business transaction with an outside party equally committed to maintaining the privacy of the account holder's personal information;
- Disclosure in compliance with federal, state or local laws, rules, and other applicable legal requirements;
- Disclosures in response to a properly authorized civil, criminal or regulatory investigation, or subpoena or summons by federal, state or local authorities.

Pursuant to Federal Law and Regulation, any information provided to us by the Financial Institution is provided only to allow us to perform the services necessary under this Agreement, to process and/or service a transaction, or as required by Federal and/or State Law and/or Regulation. Once this information is received by us from the Financial Institution, whether it is directly or indirectly through an affiliate, we may not disclose it to any person that is not affiliated with either the Financial Institution or us, unless the disclosure would be lawful if made directly by the Financial Institution.

We shall ensure that any non-affiliated third-party in receipt of this information will be bound by a written agreement containing provisions substantially similar to those contained in this Agreement. In accordance with the "Information Security Incident Policy," we also agree to promptly notify the Financial Institution in the event we are under reasonable belief that the integrity of the confidentiality of this information has been compromised.

All terms used in this document have the meaning given to them in the Gramm-Leach-Bliley Act of 1999 and its implementation of Regulation P as amended from time to time.