

Notice of Privacy Policies

We value our relationships with our customers and are dedicated to providing them with exceptional products and services. As part of our dedication to servicing their financial needs, First Empire CD Management, Inc. ("FECD") is committed to protecting the confidentiality of non-public personal information about our customers. This privacy notice is to inform our customers about the types of information that is obtained from customers, how that information is used, and the measures taken to protect that information.

Information Obtained From Customers

In order to provide services to each customer, FECD requests the customer to provide certain personal non-public information, including, but not limited to deposits, depositors and other non-public information that will assist us in performing our services.

How Information is Protected

FECD restricts access to non-public personal information to those employees who need to know that information to provide products or services to our customers. We maintain physical, electronic and procedural safeguards that comply with federal and state regulations to guard such information.

Disclosure

We do not disclose any non-public personal information about our customers or former customers to anyone except as permitted by law. Nonpublic personal information as outlined above will only be disclosed for such purposes as conducting and auditing our business, administering the business of affiliated organizations, responding to requests from government authorities or regulatory bodies, or as authorized or requested by our customers. Such disclosures include, but are not limited to:

- Affiliates – We may provide information to affiliated companies to enable them to provide business services.
- Agents – We may provide information to enable agents to offer and provide our products and services to our customers.
- Regulated Financial Institutions – We may provide information to regulated financial institutions to facilitate setup of deposits at the request of clients.
- Government Authorities and Regulatory Bodies – We may provide information upon request from governmental authorities or regulatory bodies for the purpose of preventing fraud, auditing our business, or other reason for which the entity is legally permitted to request information.

We do not share, trade, sell, exchange or disclose non-public personal information except as stated above or to otherwise service our customers accounts. It is our policy not to disclose any nonpublic personal information to non-affiliates other than service providers and third parties that aid in fulfilling the services requested by our clients.

About This Privacy Notice

The examples contained herein are provided as illustrations and are not a comprehensive account of the rights of any party under applicable federal or state laws. The policies stated herein will remain in effect even after an account is closed, to the extent that the information is retained. We may from time to time amend this policy and will inform you of any changes as required by law. For additional information, contact us via mail at the address on this letterhead.