

COMMENT LETTER

May 27, 2007

SEC Form S-P: Model Privacy Form (pdf)

Securities and Exchange Commission Form S-P A. Model Privacy Form F A C T S WHAT DOES [name of financial institution] DO WITH YOUR PERSONAL INFORMATION? Why? What? How? 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. 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 transaction history * assets and investment experience, credit history, and credit scores * bank account information if you sign up for certain account options we offer When you close your account, we continue to share information about you according to our policies. All financial companies need to share customers' personal information to run their everyday business - to process transactions and maintain customer accounts, and report to credit bureaus. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons [name of financial institution] chooses to share; and whether you can limit this sharing. Reasons we can share your personal information Does [name of financial institution] share? Can you limit this sharing? For our everyday business purposes- to process your transactions, maintain your account, and report to credit bureaus, and protect against or prevent fraud or unauthorized transactions, or comply with federal, state, or local laws or other applicable legal requirements. This sharing may be with non-affiliates. For our marketing purposes- to offer our products and services to you For joint marketing with other financial companies For our affiliates' everyday business purposes- information about your transactions and experiences For our affiliates' everyday business purposes- information about your creditworthiness For our affiliates to market to you For nonaffiliates to market to you Contact Us Call [toll-free telephone] or go to [web address] p. 1 of 3 F A C T S WHAT DOES [name of financial institution] DO WITH YOUR PERSONAL INFORMATION? Sharing practices How often does [name of financial institution] notify me about their practices? We must notify you about our sharing practices when you open an account, when we make a material change to our sharing practices, and each year while you are a customer. How does [name of financial institution] 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 may include computer safeguards and secured files and buildings. We collect your personal information, for example, when you * open an account or deposit money * buy or sell securities, pay your bills, or apply for a loan * use your credit card or debit card We may also collect your personal information from others, such as credit bureaus, affiliates, or other companies. How does [name of financial institution] collect my personal information? Why can't I limit all sharing? Federal law gives you the right to limit sharing only for * affiliates' everyday business purposes -

information about your creditworthiness * affiliates to market to you or nonaffiliates for marketing purposes * nonaffiliates to market to you * nonaffiliates unless the sharing is (1) related to processing and servicing your transactions, (2) for specified purposes authorized by law; or (3) with our service provider(s) for our joint marketing arrangements. State laws and individual companies may give you additional rights to limit sharing. Definitions
Everyday business purposes The actions necessary by financial companies to run their business and manage customer accounts, such as * processing transactions, mailing and auditing services * providing information to credit bureaus * responding to court orders and legal investigations * protecting against or preventing fraud or unauthorized transactions * complying with federal, state, or local laws or other applicable legal requirements including court orders and legal investigations Affiliates Companies related by common ownership or control. They can be financial and nonfinancial companies. * [affiliate information]
Nonaffiliates Companies not related by common ownership or control. They can be financial and nonfinancial companies. * [nonaffiliate information] Joint marketing A formal agreement between nonaffiliated financial companies that together market financial products or services to you. * [joint marketing] p. 2 of 3 F A C T S WHAT DOES [name of financial institution] DO WITH YOUR PERSONAL INFORMATION? If you want to limit our sharing By telephone: [toll-free telephone] - our menu will prompt you through your choices On the web: [web address] By mail: mark your choices below, fill in and send form to: [mailing address] Contact us Unless we hear from you, we can begin sharing your information 30 days from the date of this letter. However, you can contact us at any time to limit our sharing and we will implement your instructions as soon as reasonably practical. Check your choices Your choices will apply to everyone on your account. Check any/all you want to limit: (See page 1) Do not share information about my creditworthiness with your affiliates for their everyday business purposes. Do not allow your affiliates to use my personal information to market to me. (I will receive a renewal notice for this use for marketing in 5 years.) Do not share my personal information with nonaffiliates to market their products and services to me. Your name Mail to: [mailing address] Your address Account number p. 3 of 3