

**Gramm-Leech-Bliley  
Notices Interagency Meeting**

*Developing Compliant and  
Consumer Friendly Privacy  
Policy Notices*

Tuesday, February 17, 2004  
SEC Building, Room 1C30 • 450 5th Street, Washington, D.C.

---

---

---

---

---

---

---

---

Since 1999 Keystone Expressions, Ltd.  
has produced over **4 Million** Privacy Policy Notices  
for our nation's Credit Unions, Banks  
and Savings and Loans.



---

---

---

---

---

---

---

---

*What characteristics do  
the financial institutions who chose Keystone  
to satisfy federal regulators' requirements for  
providing Privacy Policy Notices share?*

- Regulating Agencies?
  - Asset Size?
  - Size of Order?

---

---

---

---

---

---

---

---

• Characteristics of Keystone's  
Financial Customers —

**REGULATING AGENCIES**

- 55% - Credit Unions regulated by NCUA
- 45% - Banks, National Banks, Savings Banks,  
Savings and Loans regulated by FDIC, OTS & OCC

---

---

---

---

---

---

---

---

• Characteristics of Keystone's  
Financial Customers —

**ASSET SIZE**

- Average - \$70,000,000
- Smallest - \$33,356
- Largest - \$2,044,090,000

---

---

---

---

---

---

---

---

• Characteristics of Keystone's  
Financial Customers —

**SIZE OF ORDER**

- Average - 5,000 disclosures for distribution
- Smallest - 100 disclosures for distribution
- Largest - 100,000 disclosures for distribution

---

---

---

---

---

---

---

---

**SO... What characteristics do the financial institutions who chose Keystone to satisfy federal regulators' requirements for providing Privacy Policy Notices share?**

**They Value The Following in Their Disclosure:**

- **Eye Catching, Distinctive** Graphics
- **Reader Friendly, Compliant** Copy

---

---

---

---

---

---

---

---

• **Eye Catching, Distinctive** Graphics

Cover Art Immediately Signifies Purpose and Content of Disclosure

Imagery conveys the desirable promise of anonymity.

Subtext conveys the importance of consumer privacy to the disclosing financial institution.

Availability in a variety of colors further distinguishes the institution's disclosure.




---

---

---

---

---

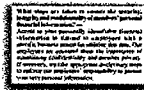
---

---

---

• **Reader Friendly, Compliant** Copy

Arrangement of required disclosure topics in a conversational, question and answer format.



Bulleted lists of required information such as:

- **Categories of information collected**
- **Categories of information disclosed**
- **Categories of affiliates and non-affiliated third parties to whom you disclose information**

• **Inform you of additional services, products, and programs we may offer**

• **We may provide data to our affiliates, including our parent company and other companies in our family of companies, and to our service providers, such as our data processing, marketing, and other service providers.**

---

---

---

---

---

---

---

---

*How do Keystone's  
Privacy Policy Disclosures  
compare to the Agencies goals  
for Privacy Notices?*

---

---

---

---

---

---

---

---

*How do Keystone's Privacy Policy Disclosures  
compare to the Agencies goals for Privacy Notices?*

**What Are the Goals of A Privacy Notice?**

- Disclosure of Notices in a manner that they can reasonably be expected to be understood by the consumer, WHILE:
- complying with federal regulations
  - enhancing the relationship with the issuing institution.

**SECURITY      INTEGRITY      CONFIDENTIALITY**

---

---

---

---

---

---

---

---

*How do Keystone's Privacy Policy Disclosures  
compare to the Agencies goals for Privacy Notices?*

**What Are the Goals of A Privacy Notice?**

- Explanation of a consumer's right to opt out (when applicable)
- Clear instructions on how that wish can be fulfilled



---

---

---

---

---

---

---

---

Security

Integrity

Confidentiality



**YOUR IMPRINT HERE  
ADDRESS**

ORDER ITEM # IL-001-02  
Keystone Expressions, Ltd. 1-800-648-5785

OUR  
**PRIVACY  
POLICY**

The following privacy principles were established to maintain the security, integrity and confidentiality of your personal financial information.

**The type of information we collect —**

We routinely collect and retain the information we obtain from your account applications, transaction history (*for deposits, loans, credit cards, etc.*) and from consumer reports. This information helps us:

- To establish and administer your accounts.  
(*Example: We ask for personally identifying information to protect your accounts from fraud.*)
- To satisfy certain regulatory requirements.  
(*Example: When you open an account that pays interest, we are required by the Internal Revenue Service to obtain your social security number.*)
- Better understand you so that we may provide you with additional or improved products and services.  
(*Example: We require information concerning your credit history and your assets to determine if you qualify for loan approval.*)

**We do not share the nonpublic personal information of our current or previous members and nonmember customers with affiliates or nonaffiliated third parties except as permitted or required by law.**

**How is that information protected?**

Access to your personally identifiable financial information is limited to employees with a specific business reason for utilizing this data. Our employees are educated about the importance of maintaining confidentiality and member privacy. If necessary, we take appropriate disciplinary steps to enforce our employees' responsibility to protect your very personal information.

In order to prevent unauthorized access to your information, we maintain security standards and procedures that conform with industry practices. These security standards and procedures are routinely tested to verify the integrity of our systems.

# OUR PRIVACY POLICY

*Security*

*Integrity*

*Confidentiality*



**YOUR IMPRINT HERE  
ADDRESS**

ORDER ITEM # F-001-04  
Keystone Expressions, Ltd. 1-800-648-5785  
C12-2001

## **OUR PRIVACY POLICY**

The following privacy principles were established to maintain the security, integrity and confidentiality of your personal financial information.

### **The type of information we collect —**

We routinely collect and retain the information we obtain from your account applications, transaction history (*for deposits, loans, credit cards, etc.*) and from consumer reports. This information helps us:

- To establish and administer your accounts.  
(*Example: We ask for personally identifying information to protect your accounts from fraud.*)
- To satisfy certain regulatory requirements.  
(*Example: When you open an account that pays interest, we are required by the Internal Revenue Service to obtain your social security number.*)
- Better understand you so that we may provide you with additional or improved products and services.  
(*Example: We require information concerning your credit history and your assets to determine if you qualify for loan approval.*)

### **The type of information we disclose, and who we share it with —**

We occasionally share your information under the following circumstances:

- Sharing your information with nonaffiliated service providers -  
It is sometimes necessary for us to provide information such as your transaction history, account balance, name and address to a third party who provides services for us. This may include vendors who prepare account statements, process checks or provide support for one of our products or services. We are permitted by law to disclose this information when our contract with these service providers specifies that:
  - *Our vendors must abide by applicable privacy laws and reflect our commitment to the confidentiality of your information.*
  - *All information disclosed is to be used only for the purpose for which it was originally intended.*

It is also permissible for us to provide financial information to one or more other financial institutions for the purpose of jointly marketing our products and services.

- Sharing your information with nonaffiliated third parties as permissible by law -

We only make disclosures of our current and previous members' and nonmember customers' nonpublic personal information to other nonaffiliated companies as permitted or required by law. These disclosures include but are not limited to sharing nonpublic personal information:

- *When we have received your prior consent.*
- *When necessary to complete a transaction you have initiated, such as a credit or debit card purchase.*
- *With a reputable credit bureau or similar consumer reporting agency.*
- *As authorized or required by law or in response to the judicial process.*

### **What steps are taken to ensure the security, integrity and confidentiality of members' personal financial information? —**

Access to your personally identifiable financial information is limited to employees with a specific business reason for utilizing this data. Our employees are educated about the importance of maintaining confidentiality and member privacy.

In order to prevent unauthorized access to your information, we maintain security standards and procedures that conform with industry practices. These security standards and procedures are routinely tested to verify the integrity of our systems.

We strive to keep your information as accurate as possible. If you believe there is an error in your information please call us immediately. We will respond to your requests to correct inaccurate information in a timely manner.

**We do not sell our member information lists to nonaffiliated third parties for marketing, solicitation or similar purposes.**

PLACE  
STAMP  
HERE

YOUR NAME HERE  
ADDRESS

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

# OUR PRIVACY POLICY

*Security*

*Integrity*

*Confidentiality*



YOUR IMPRINT HERE  
ADDRESS

• Sharing your information with nonaffiliated third parties as permissible by law - We make disclosures of our current and previous members' and nonmember customers' information to other nonaffiliated companies as permitted or required by law. These disclosures include but are not limited to sharing nonpublic personal information:

- When we have received your prior consent.
- When necessary to complete a transaction you have initiated, such as a credit or debit card purchase.
- With a reputable credit bureau or similar consumer reporting agency.
- As authorized or required by law or in response to the judicial process.

We reserve the right to disclose nonpublic personal information about our members to non-affiliated financial service providers and non-affiliated companies for marketing or related purposes unless you direct us not to on the attached opt out form.

- We may provide asset or credit history information to insurance companies and credit card providers.
- We may provide identifying information to retailers, airlines, publishers, etc. who can inform you of special offers.
- We may also provide your information to non-profit organizations.

### Your Right to "Opt Out" —

Federal Law provides consumers an opportunity to decline having certain categories of information shared among affiliated companies or with non-affiliated third parties. We have included a return mail "opt out" form with this disclosure for your convenience. Detach and return this completed form within 30 days of receiving this privacy policy brochure.

If you request that we do not share your information under the specific circumstances listed in this notice, we will comply with your wishes in a timely manner. Your choice to "opt out" will remain effective until you choose, in writing, to revoke it. In the case of a joint relationship, an opt out election by one individual will apply to the entire account.

If you do not return this form or if you indicate your approval, we reserve the right to share your information with reputable vendors we feel can provide products and services of value and interest to you.

# OUR PRIVACY POLICY

*Security*

*Integrity*

*Confidentiality*



YOUR IMPRINT HERE  
ADDRESS

ORDER ITEM # F-001-062  
Keystone Expressions, Ltd. 1-800-648-5785

