

11/16

Monthly Service

Daily Balance

Amount

# Financial Privacy Notice

## A Report on Validation Testing Results

### February 12, 2009

10/21  
10/22  
10/23  
10/24  
10/27

382.24  
308.42



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# Financial Privacy Notice— A Report on Validation Testing Results

## Background

Under the Gramm-Leach-Bliley Act (GLBA), financial institutions are required to provide their customers with privacy notices. The act requires the notices to be clear and conspicuous as well as contain accurate statements about a company's privacy practices. Companies must also provide a means for consumers to opt out of certain information sharing when they have the right to do so.

The federal agencies<sup>1</sup> (collectively “the Agencies”) that enforce the GLBA initiated a two-phase project to explore the development of paper-based, alternative financial privacy notices—or components of notices—that are easier for consumers to understand and use.

In Phase 1, the Agencies contracted with Kleimann Communication Group (KCG) to use qualitative research techniques to develop a prototype privacy notice that communicated with consumers in a clear and effective manner. Through this process, a successful, clear, and usable privacy notice was developed and recommended as a prototype.<sup>2</sup> For the second phase of the project, the Agencies contracted with Macro International to conduct data collection for a quantitative study. Overall, the KCG table notice significantly outperformed other notice styles in a diverse set of communication effectiveness measures. The KCG table notice version that contained opt-out options, however, did not perform as strongly when participants were asked questions about how to limit sharing; a number of participants did not understand how to contact the bank to opt out. Furthermore, the three-page KCG table notice raised industry concerns that the notice was too long.

In response to industry comments about notice length, the Agencies reduced the notice to the front and back sides of a single piece of paper. To improve consumer opt-out comprehension, the Agencies placed all critical information, including the mail-in opt-out form, on page one. The goal of the revisions was to develop a notice containing more explicit

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<sup>1</sup> The six federal agencies that initiated the project are: Board of Governors of the Federal Reserve System, Federal Deposit Insurance Corporation, Federal Trade Commission, National Credit Union Administration, Office of the Comptroller of the Currency, and the Securities and Exchange Commission. The Office of Thrift Supervision joined the project for the Phase 2 research and this validation testing.

<sup>2</sup> Complete details of this phase of the project are available in the final report submitted by KCG to the Agencies (<http://www.ftc.gov/privacy/privacyinitiatives/ftcfinalreport060228.pdf>).

opt-out methods and information on the first page—while retaining the design elements and high comprehension level of the prototype table notice.

Since the development of the prototype privacy notice was grounded in consumers validating the design and language choices, the Agencies agreed to conduct a small-scale study to validate the final set of changes. This report is a summary of the results of the validation testing.

*Appendix E* contains the final recommended form based on validation testing results. All notice versions and notice components tested are found in *Appendices A–D*.

## **Project Objective**

The project objective was to validate and confirm that the changes based on the results from the Phase 2 quantitative testing and the public comments did not reduce the comprehension, design integrity, and task completion of the privacy notice.

## **Validation Testing Goals**

The validation testing had the following goals with respect to the form with the three opt-out options—by phone, Internet, or mail-in form:

- **Comprehension**
  - Ensure the notice purpose is clear
  - Ensure the whole-to-part comprehension of the notice and confirm that the four key components—the title, the frame (key and secondary), the disclosure table, and the opt-out form—are effective
- **Design Integrity**
  - Ensure the legal size paper with the mail-in opt-out form on the bottom of page one does not lead consumers to miss key pieces of information
  - Ensure the table is still functioning as the focal point of the notice
  - Ensure the mail-in opt-out design and layout work
- **Task Completion**
  - Ensure the notice still promotes navigation
  - Ensure the notice enables consumers to understand how to opt out and clearly emphasizes these methods

# Final Prototype

Validation testing results confirmed that the following final notice with opt-out information achieves the goals of comprehension, design integrity, and task completion (see *Appendix E* for full-page notices with and without a mail-in form):

## Page One

Rev. [insert date]

FACTS	WHAT DOES [NAME OF FINANCIAL INSTITUTION] 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: <ul style="list-style-type: none"> <li>■ Social Security number and [income]</li> <li>■ [account balances] and [payment history]</li> <li>■ [credit history] and [credit scores]</li> </ul>																
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 [name of financial institution] chooses to share; and whether you can limit this sharing.																
Reasons we can share your personal information	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 60%; padding: 5px;">Does [name of financial institution] share?</th> <th style="width: 40%; padding: 5px;">Can you limit this sharing?</th> </tr> </thead> <tbody> <tr> <td style="padding: 5px;">For our everyday business purposes—such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, and report to credit bureaus</td> <td style="padding: 5px;"></td> </tr> <tr> <td style="padding: 5px;">For our marketing purposes—to offer our products and services to you</td> <td style="padding: 5px;"></td> </tr> <tr> <td style="padding: 5px;">For joint marketing with other financial companies</td> <td style="padding: 5px;"></td> </tr> <tr> <td style="padding: 5px;">For our affiliates' everyday business purposes—information about your transactions and experiences</td> <td style="padding: 5px;"></td> </tr> <tr> <td style="padding: 5px;">For our affiliates' everyday business purposes—information about your credit worthiness</td> <td style="padding: 5px;"></td> </tr> <tr> <td style="padding: 5px;">For our affiliates to market to you</td> <td style="padding: 5px;"></td> </tr> <tr> <td style="padding: 5px;">For nonaffiliates to market to you</td> <td style="padding: 5px;"></td> </tr> </tbody> </table>	Does [name of financial institution] share?	Can you limit this sharing?	For our everyday business purposes—such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, and report to credit bureaus		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 credit worthiness		For our affiliates to market to you		For nonaffiliates to market to you	
Does [name of financial institution] share?	Can you limit this sharing?																
For our everyday business purposes—such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, and report to credit bureaus																	
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 credit worthiness																	
For our affiliates to market to you																	
For nonaffiliates to market to you																	
To limit our sharing	<ul style="list-style-type: none"> <li>■ Call [phone number]—our menu will prompt you through your choice(s)</li> <li>■ Visit us online: [website] or</li> <li>■ Mail the form below</li> </ul> <p><b>Please note:</b> If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. If you are <i>no longer</i> 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.</p>																
Questions?	Call [phone number] or go to [website]																

  

**Mail-in Form**

If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.

Apply my choices only to me

Mark any/all you want to limit:

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.

Do not share my personal information with nonaffiliates to market their products and services to me.

<table style="width: 100%;"> <tr><td style="width: 50%; padding: 2px;">Name</td><td style="border-bottom: 1px solid black;"></td></tr> <tr><td style="padding: 2px;">Address</td><td style="border-bottom: 1px solid black;"></td></tr> <tr><td style="padding: 2px;">City, State, Zip</td><td style="border-bottom: 1px solid black;"></td></tr> <tr><td style="padding: 2px;">[Account #]</td><td style="border-bottom: 1px solid black;"></td></tr> </table>	Name		Address		City, State, Zip		[Account #]		<p><b>Mail to:</b></p> <p>[Name of Financial Institution]</p> <p>[Address1]</p> <p>[Address2]</p> <p>[City], [ST] [ZIP]</p>
Name									
Address									
City, State, Zip									
[Account #]									

<b>Page 2</b>	
<b>Who we are</b>	
Who is providing this notice?	[insert]
<b>What we do</b>	
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 include computer safeguards and secured files and buildings.  [insert]
How does [name of financial institution] collect my personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> <li>■ [open an account] or [deposit money]</li> <li>■ [pay your bills] or [apply for a loan]</li> <li>■ [use your credit or debit card]</li> </ul> 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 <ul style="list-style-type: none"> <li>■ sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>■ affiliates from using your information to market to you</li> <li>■ sharing for nonaffiliates to market to you</li> </ul> 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—unless you tell us otherwise.
<b>Definitions</b>	
<b>Affiliates</b>	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>■ [affiliate information]</li> </ul>
<b>Nonaffiliates</b>	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>■ [nonaffiliate information]</li> </ul>
<b>Joint marketing</b>	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> <li>■ [joint marketing information]</li> </ul>
<b>Other important information</b>	
[insert other important information]	

3-

## Methodology

Qualitative research uses small numbers of participants to explore how and why consumers understand and make sense of a document. For validation testing, we used a rapid-prototyping methodology—an approach that allowed us to rapidly develop, revise, and test specific aspects of the prototype within a short time-frame. This process of rapidly designing and revising allowed us to continually modify specific features of the prototype in response to testing results. During the rapid-prototyping process, we confirmed the changes to the notice through real-time data collection, thorough analysis, and the expertise of the information designers and legal experts. Because qualitative research-based rapid prototyping does not require large test samples to yield valuable results, we tested a total of seven participants in four rounds of testing. Rounds 1 through 3 focused on modifying the notice using rapid prototyping, while the primary goal of Round 4 was to confirm the form developed during the first three rounds of testing.

We conducted the testing over two weeks in the Washington, DC area on the following dates:

- Round 1: January 19, 2009 (2 participants)
- Round 2: January 23, 2009 (2 participants)
- Round 3: January 29, 2009 (2 participants)
- Round 4: February 2, 2009 (1 participant)

Participants were a mix of age, gender, income, education level, and ethnicity. All participants were fluent in English and currently had an account with a bank, savings and loan, credit union, or securities firm. In addition, over half of the participants regularly used a check cashing service.

To determine findings, KCG used the process of triangulation to identify key trends in participant responses. Triangulation analyzes data from three different analysts (a moderator, note taker, and observer) to confirm findings through convergence of these different perspectives. The “Summary of Findings” section is based on this expert analysis of data as well as coding and analysis from notetaker’s logs.

## Research Design

Each test session was carefully planned and structured to meet the validation testing goals of comprehension, design integrity, and task completion. To test notice revisions made during the rapid-prototyping process, we modified the testing structure based on the changes made to the notice after each round. Each round of testing employed multiple testing techniques and participant tasks. Testing sessions for each participant lasted approximately 90 minutes.

## Round 1

In Round 1 we tested participants' general comprehension of the notice, particularly of the opt-out information. We tested both a short opt-out version for phone and Internet only (the "letter" version) and a mail-in version (the "legal" version). We also tested two types of notices: "non-embedded" and "embedded." The non-embedded introduced a new box with information about how to limit sharing. The embedded placed the opt-out contact information under each "yes" response in the third column of the table.

As an activity, participants assembled the different components of a non-embedded notice in the order they thought was best for reading and understanding information. We tested three different headings for the new box about how to limit sharing. We also tested whether participants preferred the non-embedded or embedded version of the notice. Finally, we asked participants their opinion about putting some of the mail-in information on the back side of the mail-in form. (See *Appendix A* for samples of all notices and components tested.)

Round 1 testing had the following findings:

- Participants' overall comprehension was high.
- The headings, layout, and design worked.
- The mail-in opt-out location at the bottom of page one did not distract participants from the table.
- Participants preferred the heading "To limit our sharing."
- Participants' reactions to the embedded and non-embedded notices were mixed, so we continued to test both versions in Round 2.

## Round 2

Round 2 continued to test participants' general and opt-out comprehension. We further tested both the non-embedded and embedded versions of the mail-in notice, and we asked participants to order the components of a non-embedded and embedded notice. In the final task, we tested different versions of the mail-in form to determine which worked most effectively for participants' understanding and completion of the form. (See *Appendix B* for samples of all notices and components tested.)

Round 2 testing had the following findings:

- Participants' overall comprehension was high.
- The headings, layout, and design worked.
- The mail-in opt-out location did not distract participants from the table.
- The versions of the mail-in opt-out form with subscript address prompts did not work.
- In the embedded notice, participants noticed the third column of the table with the contact information under each "Yes"; however, their reactions to the embedded and non-embedded notices were still mixed, so we continued to test both versions in Round 3.



### Round 3

In Round 3, we continued to ask participants to order the components of a non-embedded and embedded notice. In addition, we continued to test general comprehension, opt-out comprehension, and participant preference between the non-embedded and embedded versions of the mail-in notice. We tested six new versions of the mail-in form, primarily to determine placement of the joint account information and whether participants needed prompts to fill in their address. We also tested a letter-sized, embedded version of the notice (which contained only telephone or online opt-out information). (See *Appendix C* for samples of all notices and components tested.)

Round 3 testing had the following findings:

- Participants' overall comprehension was high.
- The headings, layout, and design worked.
- The mail-in opt-out location did not distract participants from the table.
- Participants thought blank lines were sufficient for filling out address information in the mail-in opt-out form.
- The non-embedded version worked better than the embedded version because participants said its opt-out instructions were explicit and its design was less cluttered and more visually appealing.

### Round 4

In Round 4, we used the "think-aloud" technique<sup>3</sup> to test the non-embedded version resulting from the first three rounds. We also asked general and opt-out comprehension questions about the notice. We tested both the letter and the legal version of the non-embedded and embedded versions of the notice. (See *Appendix D* for samples of all notices and components tested.)

Round 4 testing had the following findings:

- Participants' overall comprehension was high.
- The headings, layout, and design worked.
- The mail-in opt-out location did not distract participants from the table.
- Participants thought blank lines were sufficient for filling out address information in the mail-in opt-out form.
- Overall, testing confirmed that the non-embedded version worked better than the embedded version.

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<sup>3</sup> The "think-aloud" technique is an unstructured and unprompted portion of the interview that allows us to capture participants' initial reactions without directed interviewer questions. Our goal is to capture the participants' reactions before they can "learn" from the testing situation and the notice. Participants react freely to and comment on the notice reviewed while we collect information on how participants integrate and synthesize the information and process this information into action.

## Summary of Findings

### Comprehension

Overall participant comprehension of the notice was strong with and without the mail-in form. Participants understood the purpose of the notice. When asked to state the main point of the notice in a few sentences, participant responses revealed a high level of comprehension.

*"[The notice] tell[s] a new customer what the bank shares and what you can limit on the sharing."*

*"[The notice] give[s] [consumers] the right to opt out in instances when the consumer has the right to opt out."*

The notice also preserved whole-to-part comprehension, and participant responses showed that the four key notice components—the title, the frame (key and secondary), the disclosure table, and opt-out form—were effective.

### **Is the title effective?**

The title continued to work well, as it had in the initial research (Phase 1). Participants reacted positively to the language and commented that the title drew them into the notice. Participants strongly preferred the heading over the typical "privacy policy" title of most notices.

*"[FACTS] is obviously the header...[it] gives you the basic gist of what this sheet is about."*

### **Is the key frame effective?**

Participants liked the organization of the key frame section ("Why?"/"What?"/"How?" boxes) because it provided basic background information. The question headings drew participants into the notice, regardless of whether the participants read or skimmed the content.

*"It gives information quite quickly, because people don't like to read."*

*"Those are just the most important information you'd want to know."*

### **Is the disclosure table effective?**

Participants knew the purpose of the table and could accurately describe the information it provided. They also understood the types of information provided in each of the three columns.

*"[The table] tells you what is being shared, who it's being shared with...and whether or not you can limit or stop it."*

*"[The table] is telling us whether the bank shares the information...and can you limit the sharing."*

Furthermore, participants thought the table belonged in the center of the first page, which indicates that the table remained the focal point of the notice.

#### ***What format is best for opt-out comprehension?***

While exploring ways to make the opt-out methods even clearer, we introduced an embedded version of the notice, which contained the opt-out instructions in the table (rather than in the “to limit our sharing” box after the table). In each round of testing, participants compared the embedded version with the non-embedded version.

Participants preferred the non-embedded version because the opt-out instructions were explicit and the design was visually appealing. Multiple participants preferred the non-embedded version because it told them exactly how to opt out. They also preferred the non-embedded notice because they perceived the table with less information as shorter and more succinct—and therefore preferable.

*“[Non-embedded] is cutting back on reading.”*

*“[Non-embedded] seems more concise.”*

In addition, several participants preferred the non-embedded version because the opt-out information was easier to spot. They commented that the font size, shading, and placement of “To limit our sharing” caught their eye.

*“It’s in its own box [in non-embedded].”*

*“The highlighted boxes draw your eye to what you’re reading.”*

#### ***Is the mail-in opt-out form effective?***

The location and content of the mail-in opt-out form tested well. All participants noticed the mail-in form and were able to use it properly.

*“Sometimes things like [the mail-in form] are in the fine print...but it’s a clearly marked section.”*

#### ***What content and design of the “To limit our sharing” box is most effective?***

During the first three rounds of testing, we observed two trends in participant responses to the mail-in form. First, participants reading the non-embedded notice either skipped over the final sentence in the “What?” box or did not retain that information. Second, in the embedded notice, participants liked the addition of the “When?” box because it contained the final sentence from the “What?” box *and* the last two sentences in the “To limit our sharing” box. Participants gravitated toward the logic of grouping together information about new customers and former customers.

Because both trends suggested that the information about new and former customers belonged together, we decided to put the two pieces of information in the same location. When determining where to put this text, we considered two findings. First, when reading the information in the key frame, participants sometimes skipped over content such as the “When?” box in the embedded version. Second, participants reacted positively to the “To limit our sharing” box. We therefore decided to place the new and former customer information in the “To limit our sharing” box.<sup>4</sup> To separate the text from the opt-out methods, we added the bold title “Please note.”

Our final participant in Round 4 confirmed this decision, specifically saying that, although she liked the embedded version because of the concept of the “When?” box, she preferred the non-embedded version because it contained the “To limit our sharing” box. However, she noted that the extra text in the box detracted from the opt-out information. To bring the focus of the box back to the methods of opting out, we revised the alignment of the bulleted list and bolded key information in the opt-out instructions.

Also, participants strongly preferred the “To limit our sharing” heading placed in a gray box with a design parallel to the boxes in the secondary frame.

*“It’s bolded and eye-catching here.”*

These results confirmed the following design:

<b>To limit our sharing</b>	<ul style="list-style-type: none"><li>■ Call <b>[phone number]</b>—our menu will prompt you through your choice(s)</li><li>■ Visit us online: <b>[website]</b> or</li><li>■ Mail the <b>form</b> below</li></ul> <p><b>Please note:</b></p> <p>If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. If you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
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### Design Integrity

The overall design of the notice worked. Participants were drawn to the design and remarked the notice is readable, especially compared to the “typical” notices they receive in the mail. We explored the following three specific questions around design: (1) Does the mail-in form detract from the table?, (2) Where is the best placement for the “Questions?” box?, and (3) What is the best design and layout for the mail-in form?

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<sup>4</sup> The model notice with no opt-out options will not have the “To limit our sharing” box. In this case, the “former customer” sentence will appear as the last sentence in the “What” box one page one.

**Does the mail-in form detract from the table?**

Placing the mail-in form on the front page of the notice did not detract from the table or the rest of the notice. Participants consistently referred to the table as “the meat” of the notice, and no participants identified the mail-in form as the most important part of the notice.

*“The meat of the notice is in the middle.”*

*“[The table] gives you the meat of it.”*

After reading the mail-in notice, participants knew why they were receiving the notice, understood in which cases they could limit sharing, and identified the different methods of opting out. The addition of the mail-in form did not undermine reader comprehension or the notice design.

**Where is the best placement of the “Questions?” box?**

Participants preferred the “Questions?” box at the end, after the “To limit our sharing” box and before the mail-in form.



Many thought that it was important to read all other information before calling because the rest of the notice might answer their questions.

*“You needed to have all the information... before you had questions.”*

*“People need to read all this first to see if they get all the answers.”*

One participant commented that putting “Questions?” at the end of the notice was more efficient for both the bank and the consumer. If consumers read the entire first page of the notice before seeing the “Questions?” box, it might prevent consumers from calling and asking questions the form answered.

*“For expediency’s sake... saves you a phone call and saves them from having to provide answers.”*

### **What is the best design and layout for the mail-in form?**

After testing a number of design variations of the mail-in form, the results confirmed the following design:

Mail-in Form								
If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below. <input type="checkbox"/> Apply my choices only to me	Mark any/all you want to limit: <input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes. <input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me. <input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.							
	<table border="1"><tr><td>Name</td><td></td></tr><tr><td>Address</td><td></td></tr><tr><td>City, State, Zip</td><td></td></tr><tr><td>[Account #]</td><td></td></tr></table>	Name		Address		City, State, Zip		[Account #]
Name								
Address								
City, State, Zip								
[Account #]								
	<b>Mail to:</b> [Name of Financial Institution] [Address1] [Address2] [City], [ST] [ZIP]							

The key issues in designing the mail-in form concerned (1) the best placements of the “mail to” address and the joint account information, and (2) the level of detail needed for the address prompts.

Testing results showed that the “mail to” address belonged in the bottom right corner and that the joint account information worked best in the left column. One participant provided compelling logic for placing the “mail to” information in the bottom right corner. He explained that the bottom right location was better because he would want to see the address after he filled out the form, not beforehand. He would want to “take care of all this other information first [and] not have to look back across the page.”

We tested several versions in which the “mail to” address was moved to the left column and the joint account information was placed below the check boxes the customer marks to limit sharing. However, these versions did not work because participants preferred having the joint account information checkbox on the left (rather than under the three checkboxes for limiting sharing). Participants thought this placement visually separated the different types of checkboxes.

The second design question for the mail-in form was whether including address detail prompts (e.g., street, city/town, state, zip code) helped participants fill out the form. We tested many variations of these prompts, including subscripts, prompts embedded in the address lines, and the use of vertical lines to separate each address detail. Participants found the subscripts confusing because it was unclear if they should write on the line above or below the prompts. Some participants found the embedded prompts and vertical lines helpful.

However, others thought that the details were unnecessary and made it more difficult to fill out the form.

In light of these mixed findings, we identified plain-language research indicating that some people omit address information, particularly zip code, when not provided with prompts. To reconcile this need for guidance with multiple participants' preference for blank address lines, we added "City, State, Zip" to the shaded portion of the third address line.

While we tested several other versions of the mail-in form, none worked well. We tested two versions in which some information was on the front of the mail-in form and some information was on the back. Participants strongly disliked having the information in two different places, primarily because it was inconvenient to flip back and forth between the first and second page of the notice. Participants also reacted negatively to a version in which the box containing "Name," "Address," and "Account #" was unshaded. They preferred the design of the shaded version because it was visually appealing and helped them fill out the form.

### **Task Completion**

The mail-in version of the notice promoted navigation. Participants were able to articulate a logical progression of information on pages one and two. The relationship between the three columns in the table on page one was also very clear to participants.

Participants also understood next steps to take after reading the notice. Most participants said they would call or go online to opt out of sharing. When given the task of opting out by mail, participants demonstrated their ability to locate, fill in, and mail the form.

### **Conclusion**

Validation testing has confirmed the language and design choices of the prototype financial notice. Testing results show that placing all opt-out information on page one and reducing the notice to two pages does not compromise the notice's comprehension, design integrity, or task completion. The final recommended notice provides clear, accurate privacy policy information in a way that consumers can understand and use to decide if they want to opt out of sharing.

# Appendices



## **Appendix A—Round 1 Test Notices**

- **Components of Non-embedded Letter Notice**
- **Versions of “To limit our sharing” Box**
- **Non-embedded Legal Notice**
- **Embedded Legal Notice**
- **Versions of Mail-in Form**

# Round 1—Components of Non-embedded Letter Notice

## Component 1

Questions?	Call 866-555-1212 or go to <a href="http://www.hb.com">www.hb.com</a>
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## Component 2

<b>FACTS</b>	<b>WHAT DOES HELENE BANK DO WITH YOUR PERSONAL INFORMATION?</b>
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## Component 3

To limit our sharing	<ul style="list-style-type: none"> <li>▪ Call 866-555-1111—our menu will prompt you through your choice(s)</li> <li style="text-align: center;">or</li> <li>▪ Visit us online: <a href="http://www.hb.com">www.hb.com</a></li> </ul> <p>If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. However, you can contact us at any time to limit our sharing.</p>
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## Component 4

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?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>▪ Social Security number and income</li> <li>▪ account balances and payment history</li> <li>▪ credit history and credit scores</li> </ul>
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 Helene Bank chooses to share; and whether you can limit this sharing.

## Component 5

Reasons we can share your personal information	Does Helene Bank 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, and report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your credit worthiness	Yes	Yes
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For nonaffiliates to market to you</b>	Yes	Yes

## Round 1—Versions of “To limit our sharing” Box

### Option A

If you want to limit our sharing	
<b>Your choices</b>	<ul style="list-style-type: none"><li>▪ Call 866-555-1111—our menu will prompt you through your choice(s) or</li><li>▪ Visit us online: <a href="http://www.hb.com">www.hb.com</a></li></ul> <p>If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. However, you can contact us at any time to limit our sharing.</p>

### Option B

<b>To limit our sharing</b>	<ul style="list-style-type: none"><li>▪ Call 866-555-1111—our menu will prompt you through your choice(s) or</li><li>▪ Visit us online: <a href="http://www.hb.com">www.hb.com</a></li></ul> <p>If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. However, you can contact us at any time to limit our sharing.</p>
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### Option C

<b>Your choices</b>	<ul style="list-style-type: none"><li>▪ Call 866-555-1111—our menu will prompt you through your choice(s) or</li><li>▪ Visit us online: <a href="http://www.hb.com">www.hb.com</a></li></ul> <p>If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. However, you can contact us at any time to limit our sharing.</p>
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# FACTS

## WHAT DOES HELENE BANK DO WITH YOUR PERSONAL INFORMATION?

<b>Why?</b>	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.
<b>What?</b>	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>▪ Social Security number and income</li> <li>▪ account balances and payment history</li> <li>▪ credit history and credit scores</li> </ul> <p>When you are no longer our customer, we continue to share information about you as described in this notice.</p>
<b>How?</b>	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 Helene Bank chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Helene Bank 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, and report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your credit worthiness	Yes	Yes
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For nonaffiliates to market to you</b>	Yes	Yes

<b>To limit our sharing</b>	<ul style="list-style-type: none"> <li>▪ Call 866-555-1111—our menu will prompt you through your choice(s)</li> <li>▪ Visit us online: <a href="http://www.hb.com">www.hb.com</a></li> </ul> <p style="text-align: center;"><b>or</b></p> <ul style="list-style-type: none"> <li>▪ Mail the form below</li> </ul> <p>If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. However, you can contact us at any time to limit our sharing.</p>
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<b>Questions?</b>	Call 866-555-1212 or go to <a href="http://www.hb.com">www.hb.com</a>
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Mail-in Form		
<p>If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.</p> <p><input type="checkbox"/> Apply my choices only to me</p>	<p><b>Mark any/all you want to limit:</b></p> <p><input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes.</p> <p><input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.</p> <p><input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.</p>	<p><b>Mail to:</b></p> <p>Helene Bank 123 Main Street Suite 1 Cityville, MD 20000</p>
Name		
Address		
Account Number		

## Who we are

<b>Who is providing this notice?</b>	Helene Bank, Calypso Insurance, and Atlas Mortgage
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## What we do

<b>How does Helene Bank protect my personal information?</b>	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.
<b>How does Helene Bank collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>▪ open an account or deposit money</li> <li>▪ pay your bills or apply for a loan</li> <li>▪ use your credit or debit card</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>▪ sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>▪ affiliates from using your information to market to you</li> <li>▪ sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices will apply to everyone on your account—unless you tell us otherwise.

## Definitions

<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>Our affiliates include companies with a Helene name; financial companies, such as Calypso Insurance and Atlas Mortgage; and nonfinancial companies, such as Titan Marketing Agency.</i></li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>Nonaffiliates we share with can include mortgage companies, insurance companies, direct marketing companies, and nonprofit organizations.</i></li> </ul>
<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>▪ <i>Our joint marketing partners include credit card companies.</i></li> </ul>

## Other important information

Vermont law places additional limits on sharing information. We will not share personal information about Vermont residents with companies that are not affiliated with Helene Bank except for our everyday business purposes or where we have joint marketing agreements.



# FACTS

## WHAT DOES HELENE BANK DO WITH YOUR PERSONAL INFORMATION?

<b>Why?</b>	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.
<b>What?</b>	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> <li>▪ Social Security number and income</li> <li>▪ account balances and payment history</li> <li>▪ credit history and credit scores</li> </ul>
<b>How?</b>	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 Helene Bank chooses to share; and whether you can limit this sharing.
<b>When?</b>	If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. However, you can contact us at any time to limit our sharing.  When you are no longer our customer, we continue to share information about you as described in this notice.

Reasons we can share your personal information	Does Helene Bank 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, and report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your credit worthiness	Yes	Yes <i>(call 866-555-1111, visit www.hb.com, or mail the form below)</i>
<b>For our affiliates to market to you</b>	Yes	Yes <i>(call 866-555-1111, visit www.hb.com, or mail the form below)</i>
<b>For nonaffiliates to market to you</b>	Yes	Yes <i>(call 866-555-1111, visit www.hb.com, or mail the form below)</i>

<b>Questions?</b>	Call 866-555-1212 or go to <a href="http://www.hb.com">www.hb.com</a>
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### Mail-in Form

<p>If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.</p> <p><input type="checkbox"/> Apply my choices only to me</p>	<p><b>Mark any/all you want to limit:</b></p> <p><input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes.</p> <p><input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.</p> <p><input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.</p>	
	<b>Name</b>	
	<b>Address</b>	
	<b>Account Number</b>	
		<p><b>Mail to:</b></p> <p>Helene Bank 123 Main Street Suite 1 Cityville, MD 20000</p>

## Who we are

### Who is providing this notice?

Helene Bank, Calypso Insurance, and Atlas Mortgage

## What we do

### How does Helene Bank 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.

### How does Helene Bank collect my personal information?

We collect your personal information, for example, when you

- open an account or deposit money
- pay your bills or apply for a loan
- use your credit or debit card

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—unless you tell us otherwise.

## Definitions

### Affiliates

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

- *Our affiliates include companies with a Helene name; financial companies, such as Calypso Insurance and Atlas Mortgage; and nonfinancial companies, such as Titan Marketing Agency.*

### Nonaffiliates

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

- *Nonaffiliates we share with can include mortgage companies, insurance companies, direct marketing companies, and nonprofit organizations.*

### Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- *Our joint marketing partners include credit card companies.*

## Other important information

Vermont law places additional limits on sharing information. We will not share personal information about Vermont residents with companies that are not affiliated with Helene Bank except for our everyday business purposes or where we have joint marketing agreements.



## Round 1—Versions of Mail-in Form

### Split, left column

Front:



Mail-in Form	
<p>If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.</p> <p><input type="checkbox"/> Apply my choices only to me</p>	<p><b>Mark any/all you want to limit:</b></p> <ul style="list-style-type: none"><li><input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes.</li><li><input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.</li><li><input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.</li></ul>

Please fill in reverse side.

Back:



Mail-in Form		
Name		<b>Mail to:</b> Helene Bank 123 Main Street Suite 1 Cityville, MD 20000
Address		
Account Number		



**Split, no left column**

Front:



**Mail-in Form**

**Mark any/all you want to limit:**

- 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.
- Do not share my personal information with nonaffiliates to market their products and services to me.

If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.

- Apply my choices only to me

**Please fill in reverse side.**

Back:



**Mail-in Form**

Name		<b>Mail to:</b> Helene Bank 123 Main Street Suite 1 Cityville, MD 20000
Address		
Account Number		

## **Appendix B—Round 2 Test Notices**

- **Components of Non-embedded Letter Notice**
- **Components of Embedded Letter Notice**
- **Non-embedded Legal Notice**
- **Embedded Legal Notice**
- **Versions of Mail-in Form**

## Round 2—Components of Non-embedded Letter Notice

### Component 1

Questions?	Call 866-555-1212 or go to <a href="http://www.hb.com">www.hb.com</a>
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### Component 2

<b>FACTS</b>	<b>WHAT DOES HELENE BANK DO WITH YOUR PERSONAL INFORMATION?</b>
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### Component 3

<b>To limit our sharing</b>	<ul style="list-style-type: none"> <li>▪ Call 866-555-1111—our menu will prompt you through your choice(s)</li> <li style="text-align: center;">or</li> <li>▪ Visit us online: <a href="http://www.hb.com">www.hb.com</a></li> </ul> <p>If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. However, you can contact us at any time to limit our sharing.</p>
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### Component 4

<b>Why?</b>	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.
<b>What?</b>	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>▪ Social Security number and income</li> <li>▪ account balances and payment history</li> <li>▪ credit history and credit scores</li> </ul>
<b>How?</b>	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 Helene Bank chooses to share; and whether you can limit this sharing.

### Component 5

Reasons we can share your personal information	Does Helene Bank 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, and report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your credit worthiness	Yes	Yes
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For nonaffiliates to market to you</b>	Yes	Yes

## Round 2—Components of Embedded Letter Notice

### Component 1

Questions?	Call 866-555-1212 or go to <a href="http://www.hb.com">www.hb.com</a>
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### Component 2

<b>FACTS</b>	<b>WHAT DOES HELENE BANK DO WITH YOUR PERSONAL INFORMATION?</b>
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### Component 3

When?	<p>If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. However, you can contact us at any time to limit our sharing.</p> <p>When you are no longer our customer, we continue to share information about you as described in this notice.</p>
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<b>For our affiliates to market to you</b>	Yes	Yes <i>(call 866-555-1111 or visit <a href="http://www.hb.com">www.hb.com</a>)</i>
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# FACTS

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<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your credit worthiness	Yes	Yes
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For nonaffiliates to market to you</b>	Yes	Yes

<b>To limit our sharing</b>	<ul style="list-style-type: none"> <li>▪ Call 866-555-1111—our menu will prompt you through your choice(s)</li> <li>▪ Visit us online: <a href="http://www.hb.com">www.hb.com</a></li> </ul> <p style="text-align: center;"><b>or</b></p> <ul style="list-style-type: none"> <li>▪ Mail the form below</li> </ul> <p>If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. However, you can contact us at any time to limit our sharing.</p>
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<b>Questions?</b>	Call 866-555-1212 or go to <a href="http://www.hb.com">www.hb.com</a>
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Mail-in Form		
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## Who we are

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# FACTS

## WHAT DOES HELENE BANK DO WITH YOUR PERSONAL INFORMATION?

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<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your credit worthiness	Yes	Yes <i>(call 866-555-1111, visit www.hb.com, or mail the form below)</i>
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<b>For nonaffiliates to market to you</b>	Yes	Yes <i>(call 866-555-1111, visit www.hb.com, or mail the form below)</i>

<b>Questions?</b>	Call 866-555-1212 or go to <a href="http://www.hb.com">www.hb.com</a>
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### Mail-in Form

<p>If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.</p> <p><input type="checkbox"/> Apply my choices only to me</p>	<p><b>Mark any/all you want to limit:</b></p> <p><input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes.</p> <p><input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.</p> <p><input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.</p>	
	<b>Name</b>	
	<b>Address</b>	
	<b>Account Number</b>	
		<p><b>Mail to:</b></p> <p>Helene Bank 123 Main Street Suite 1 Cityville, MD 20000</p>

## Who we are

### Who is providing this notice?

Helene Bank, Calypso Insurance, and Atlas Mortgage

## What we do

### How does Helene Bank 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.

### How does Helene Bank collect my personal information?

We collect your personal information, for example, when you

- open an account or deposit money
- pay your bills or apply for a loan
- use your credit or debit card

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—unless you tell us otherwise.

## Definitions

### Affiliates

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

- *Our affiliates include companies with a Helene name; financial companies, such as Calypso Insurance and Atlas Mortgage; and nonfinancial companies, such as Titan Marketing Agency.*

### Nonaffiliates

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

- *Nonaffiliates we share with can include mortgage companies, insurance companies, direct marketing companies, and nonprofit organizations.*

### Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- *Our joint marketing partners include credit card companies.*

## Other important information

Vermont law places additional limits on sharing information. We will not share personal information about Vermont residents with companies that are not affiliated with Helene Bank except for our everyday business purposes or where we have joint marketing agreements.





## Round 2—Versions of Mail-in Form

### Vertical lines



Mail-in Form		
<b>Mail to:</b> Helene Bank 123 Main Street Suite 1 Cityville, MD 20000	<b>Mark any/all you want to limit:</b> <ul style="list-style-type: none"><li><input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes.</li><li><input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.</li><li><input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.</li></ul>	
	If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below. <ul style="list-style-type: none"><li><input type="checkbox"/> Apply my choices only to me</li></ul>	
<b>Name</b>		
<b>Address</b>	Street	Apt #
	City/Town	State
<b>Account #</b>		

### Subscript under



Mail-in Form		
<b>Mail to:</b> Helene Bank 123 Main Street Suite 1 Cityville, MD 20000	<b>Mark any/all you want to limit:</b> <ul style="list-style-type: none"><li><input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes.</li><li><input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.</li><li><input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.</li></ul>	
	If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below. <ul style="list-style-type: none"><li><input type="checkbox"/> Apply my choices only to me</li></ul>	
<b>Name</b>		
<b>Address</b>	Street	Apt #
	City/Town	State
<b>Account #</b>		

**Gray subscript under**



<b>Mail to:</b> Helene Bank 123 Main Street Suite 1 Cityville, MD 20000				<b>Mark any/all you want to limit:</b> <input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes. <input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me. <input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.					
				If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below. <input type="checkbox"/> Apply my choices only to me					
<b>Name</b>									
<b>Address</b>									
				(Street)		(Apt #)			
<b>Account #</b>				(City/Town)		(State)		(Zip)	

**Blank**



<b>Mail-in Form</b>			
<b>Mail to:</b> Helene Bank 123 Main Street Suite 1 Cityville, MD 20000		<b>Mark any/all you want to limit:</b> <input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes. <input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me. <input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.	
		If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below. <input type="checkbox"/> Apply my choices only to me	
<b>Name</b>			
<b>Address</b>			
<b>Account #</b>			

**Unshaded and number**



**Mail-in Form**

**Mail to:**

Helene Bank  
123 Main Street  
Suite 1  
Cityville, MD  
20000

**Mark any/all you want to limit:**

- 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.
- Do not share my personal information with nonaffiliates to market their products and services to me.

If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.

- Apply my choices only to me

**Name**

**Address**

Number & Street

Apt #

City/Town

State

Zip

**Account #**

## **Appendix C—Round 3 Test Notices**

- **Components of Non-embedded Letter Notice**
- **Components of Embedded Letter Notice**
- **Non-embedded Legal Notice**
- **Embedded Legal Notice**
- **Versions of Mail-in Form**
- **Embedded Letter Notice**

## Round 3—Components of Non-embedded Letter Notice

### Component 1

Questions?	Call 866-555-1212 or go to <a href="http://www.hb.com">www.hb.com</a>
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### Component 2

<b>FACTS</b>	<b>WHAT DOES HELENE BANK DO WITH YOUR PERSONAL INFORMATION?</b>
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### Component 3

<b>To limit our sharing</b>	<ul style="list-style-type: none"> <li>▪ Call 866-555-1111—our menu will prompt you through your choice(s)</li> <li style="text-align: center;">or</li> <li>▪ Visit us online: <a href="http://www.hb.com">www.hb.com</a></li> </ul> <p>If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. However, you can contact us at any time to limit our sharing.</p>
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### Component 4

<b>Why?</b>	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.
<b>What?</b>	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>▪ Social Security number and income</li> <li>▪ account balances and payment history</li> <li>▪ credit history and credit scores</li> </ul>
<b>How?</b>	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 Helene Bank chooses to share; and whether you can limit this sharing.

### Component 5

Reasons we can share your personal information	Does Helene Bank 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, and report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your credit worthiness	Yes	Yes
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For nonaffiliates to market to you</b>	Yes	Yes

## Round 3—Components of Embedded Letter Notice

### Component 1

Questions?	Call 866-555-1212 or go to <a href="http://www.hb.com">www.hb.com</a>
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### Component 2

<b>FACTS</b>	<b>WHAT DOES HELENE BANK DO WITH YOUR PERSONAL INFORMATION?</b>
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### Component 3

When?	<p>If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. However, you can contact us at any time to limit our sharing.</p> <p>When you are no longer our customer, we continue to share information about you as described in this notice.</p>
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### Component 4

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?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>▪ Social Security number and income</li> <li>▪ account balances and payment history</li> <li>▪ credit history and credit scores</li> </ul>
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 Helene Bank chooses to share; and whether you can limit this sharing.

### Component 5

Reasons we can share your personal information	Does Helene Bank 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, and report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your credit worthiness	Yes	Yes <i>(call 866-555-1111 or visit <a href="http://www.hb.com">www.hb.com</a>)</i>
<b>For our affiliates to market to you</b>	Yes	Yes <i>(call 866-555-1111 or visit <a href="http://www.hb.com">www.hb.com</a>)</i>
<b>For nonaffiliates to market to you</b>	Yes	Yes <i>(call 866-555-1111 or visit <a href="http://www.hb.com">www.hb.com</a>)</i>

# FACTS

## WHAT DOES HELENE BANK DO WITH YOUR PERSONAL INFORMATION?

<b>Why?</b>	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.
<b>What?</b>	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>▪ Social Security number and income</li> <li>▪ account balances and payment history</li> <li>▪ credit history and credit scores</li> </ul> <p>When you are no longer our customer, we continue to share information about you as described in this notice.</p>
<b>How?</b>	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 Helene Bank chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Helene Bank 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, and report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your credit worthiness	Yes	Yes
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For nonaffiliates to market to you</b>	Yes	Yes

<b>To limit our sharing</b>	<ul style="list-style-type: none"> <li>▪ Call 866-555-1111—our menu will prompt you through your choice(s)</li> <li>▪ Visit us online: <a href="http://www.hb.com">www.hb.com</a></li> </ul> <p style="text-align: center;"><b>or</b></p> <ul style="list-style-type: none"> <li>▪ Mail the form below</li> </ul> <p>If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. However, you can contact us at any time to limit our sharing.</p>
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<b>Questions?</b>	Call 866-555-1212 or go to <a href="http://www.hb.com">www.hb.com</a>
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Mail-in Form		
<p>If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.</p> <p><input type="checkbox"/> Apply my choices only to me</p>	<p><b>Mark any/all you want to limit:</b></p> <p><input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes.</p> <p><input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.</p> <p><input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.</p>	<p><b>Mail to:</b></p> <p>Helene Bank 123 Main Street Suite 1 Cityville, MD 20000</p>
Name		
Address		
Account Number		

## Who we are

<b>Who is providing this notice?</b>	Helene Bank, Calypso Insurance, and Atlas Mortgage
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## What we do

<b>How does Helene Bank protect my personal information?</b>	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.
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<b>How does Helene Bank collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>▪ open an account or deposit money</li> <li>▪ pay your bills or apply for a loan</li> <li>▪ use your credit or debit card</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
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<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>▪ sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>▪ affiliates from using your information to market to you</li> <li>▪ sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
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<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices will apply to everyone on your account—unless you tell us otherwise.
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## Definitions

<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>Our affiliates include companies with a Helene name; financial companies, such as Calypso Insurance and Atlas Mortgage; and nonfinancial companies, such as Titan Marketing Agency.</i></li> </ul>
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<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>Nonaffiliates we share with can include mortgage companies, insurance companies, direct marketing companies, and nonprofit organizations.</i></li> </ul>
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<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>▪ <i>Our joint marketing partners include credit card companies.</i></li> </ul>
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## Other important information

Vermont law places additional limits on sharing information. We will not share personal information about Vermont residents with companies that are not affiliated with Helene Bank except for our everyday business purposes or where we have joint marketing agreements.





# FACTS

## WHAT DOES HELENE BANK DO WITH YOUR PERSONAL INFORMATION?

<b>Why?</b>	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.
<b>What?</b>	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> <li>▪ Social Security number and income</li> <li>▪ account balances and payment history</li> <li>▪ credit history and credit scores</li> </ul>
<b>How?</b>	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 Helene Bank chooses to share; and whether you can limit this sharing.
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Reasons we can share your personal information	Does Helene Bank share?	Can you limit this sharing?
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<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your credit worthiness	Yes	Yes <i>(call 866-555-1111, visit www.hb.com, or mail the form below)</i>
<b>For our affiliates to market to you</b>	Yes	Yes <i>(call 866-555-1111, visit www.hb.com, or mail the form below)</i>
<b>For nonaffiliates to market to you</b>	Yes	Yes <i>(call 866-555-1111, visit www.hb.com, or mail the form below)</i>

<b>Questions?</b>	Call 866-555-1212 or go to <a href="http://www.hb.com">www.hb.com</a>
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### Mail-in Form

<p>If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.</p> <p><input type="checkbox"/> Apply my choices only to me</p>	<p><b>Mark any/all you want to limit:</b></p> <p><input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes.</p> <p><input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.</p> <p><input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.</p>	
	<b>Name</b>	
	<b>Address</b>	
	<b>Account Number</b>	
		<p><b>Mail to:</b></p> <p>Helene Bank 123 Main Street Suite 1 Cityville, MD 20000</p>

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- use your credit or debit card

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- affiliates from using your information to market to you
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## Definitions

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

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## Other important information

Vermont law places additional limits on sharing information. We will not share personal information about Vermont residents with companies that are not affiliated with Helene Bank except for our everyday business purposes or where we have joint marketing agreements.



## Round 3—Versions of Mail-in Form

### Joint account information on left

Blank:



Mail-in Form		
<p>If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.</p> <p><input type="checkbox"/> Apply my choices only to me</p>	<p><b>Mark any/all you want to limit:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes.</li> <li><input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.</li> <li><input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.</li> </ul>	
<b>Name</b>		<p><b>Mail to:</b></p> <p>Helene Bank 123 Main Street Suite 1 Cityville, MD 20000</p>
<b>Address</b>		
<b>Account #</b>		

Prompts:



Mail-in Form						
<p>If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.</p> <p><input type="checkbox"/> Apply my choices only to me</p>	<p><b>Mark any/all you want to limit:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes.</li> <li><input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.</li> <li><input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.</li> </ul>					
<b>Name</b>		<p><b>Mail to:</b></p> <p>Helene Bank 123 Main Street Suite 1 Cityville, MD 20000</p>				
<b>Address</b>	<table style="width: 100%; border: none;"> <tr> <td style="width: 60%;">Street</td> <td style="width: 20%; text-align: right;">Apt #</td> </tr> <tr> <td>City/Town</td> <td style="text-align: right;">State      Zip</td> </tr> </table>		Street	Apt #	City/Town	State      Zip
Street	Apt #					
City/Town	State      Zip					
<b>Account #</b>						

Colons:



Mail-in Form		
If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below. <input type="checkbox"/> Apply my choices only to me	<b>Mark any/all you want to limit:</b> <input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes. <input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me. <input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.	
	<b>Name</b>	
<b>Address</b>	Street: _____ Apt #: _____	<b>Mail to:</b> Helene Bank 123 Main Street Suite 1 Cityville, MD 20000
	City/Town: _____ State: _____ Zip: _____	
<b>Account #</b>		

**Joint account information under three check boxes**

Blank:



Mail-in Form	
<b>Mail to:</b> Helene Bank 123 Main Street Suite 1 Cityville, MD 20000	<b>Mark any/all you want to limit:</b> <input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes. <input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me. <input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.
	If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below. <input type="checkbox"/> Apply my choices only to me
<b>Name</b>	
<b>Address</b>	
<b>Account #</b>	

Prompts:



Mail-in Form	
<b>Mail to:</b> Helene Bank 123 Main Street Suite 1 Cityville, MD 20000	<b>Mark any/all you want to limit:</b> <ul style="list-style-type: none"><li><input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes.</li><li><input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.</li><li><input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.</li></ul>
	If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below. <ul style="list-style-type: none"><li><input type="checkbox"/> Apply my choices only to me</li></ul>
<b>Name</b>	
<b>Address</b>	Street <span style="float: right;">Apt #</span>
	City/Town <span style="margin-left: 150px;">State</span> <span style="float: right;">Zip</span>
<b>Account #</b>	

Colons:



Mail-in Form	
<b>Mail to:</b> Helene Bank 123 Main Street Suite 1 Cityville, MD 20000	<b>Mark any/all you want to limit:</b> <ul style="list-style-type: none"><li><input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes.</li><li><input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.</li><li><input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.</li></ul>
	If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below. <ul style="list-style-type: none"><li><input type="checkbox"/> Apply my choices only to me</li></ul>
<b>Name</b>	
<b>Address</b>	Street: <span style="float: right;">Apt #:</span>
	City/Town: <span style="margin-left: 150px;">State:</span> <span style="float: right;">Zip:</span>
<b>Account #</b>	

Vertical lines:



Mail-in Form			
<b>Mail to:</b> Helene Bank 123 Main Street Suite 1 Cityville, MD 20000	<b>Mark any/all you want to limit:</b> <ul style="list-style-type: none"><li><input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes.</li><li><input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.</li><li><input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.</li></ul>		
	If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below. <ul style="list-style-type: none"><li><input type="checkbox"/> Apply my choices only to me</li></ul>		
<b>Name</b>			
<b>Address</b>	Street		Apt #
	City/Town	State	Zip
<b>Account #</b>			

New heading:



Mail-in Form			
<b>Mail to:</b> Helene Bank 123 Main Street Suite 1 Cityville, MD 20000	<b>Mark any/all you want to limit:</b> <ul style="list-style-type: none"><li><input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes.</li><li><input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.</li><li><input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.</li></ul>		
	<b>For joint account holders:</b> If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below. <ul style="list-style-type: none"><li><input type="checkbox"/> Apply my choices only to me</li></ul>		
<b>Name</b>			
<b>Address</b>			
<b>Account #</b>			

# FACTS

## WHAT DOES HELENE BANK DO WITH YOUR PERSONAL INFORMATION?

<b>Why?</b>	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.
<b>What?</b>	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> <li>▪ Social Security number and income</li> <li>▪ account balances and payment history</li> <li>▪ credit history and credit scores</li> </ul>
<b>How?</b>	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 Helene Bank chooses to share; and whether you can limit this sharing.
<b>When?</b>	If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. However, you can contact us at any time to limit our sharing.  When you are no longer our customer, we continue to share information about you as described in this notice.

Reasons we can share your personal information	Does Helene Bank 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, and report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your credit worthiness	Yes	Yes <i>(call 866-555-1111 or visit www.hb.com)</i>
<b>For our affiliates to market to you</b>	Yes	Yes <i>(call 866-555-1111 or visit www.hb.com)</i>
<b>For nonaffiliates to market to you</b>	Yes	Yes <i>(call 866-555-1111 or visit www.hb.com)</i>

<b>Questions?</b>	Call 866-555-1212 or go to <a href="http://www.hb.com">www.hb.com</a>
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## Who we are

<b>Who is providing this notice?</b>	Helene Bank, Calypso Insurance, and Atlas Mortgage
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## What we do

<b>How does Helene Bank protect my personal information?</b>	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.
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<b>How does Helene Bank collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>▪ open an account or deposit money</li> <li>▪ pay your bills or apply for a loan</li> <li>▪ use your credit or debit card</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
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<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>▪ sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>▪ affiliates from using your information to market to you</li> <li>▪ sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
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<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices will apply to everyone on your account—unless you tell us otherwise.
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## Definitions

<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>Our affiliates include companies with a Helene name; financial companies, such as Calypso Insurance and Atlas Mortgage; and nonfinancial companies, such as Titan Marketing Agency.</i></li> </ul>
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<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>Nonaffiliates we share with can include mortgage companies, insurance companies, direct marketing companies, and nonprofit organizations.</i></li> </ul>
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<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>▪ <i>Our joint marketing partners include credit card companies.</i></li> </ul>
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## Other important information

Vermont law places additional limits on sharing information. We will not share personal information about Vermont residents with companies that are not affiliated with Helene Bank except for our everyday business purposes or where we have joint marketing agreements.



## Appendix D—Round 4 Test Notices

- **Non-embedded Letter Notice**
- **Non-embedded Legal Notice**
- **Embedded Letter Notice**
- **Embedded Legal Notice**

# FACTS

## WHAT DOES HELENE BANK DO WITH YOUR PERSONAL INFORMATION?

<b>Why?</b>	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.
<b>What?</b>	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>▪ Social Security number and income</li> <li>▪ account balances and payment history</li> <li>▪ credit history and credit scores</li> </ul>
<b>How?</b>	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 Helene Bank chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Helene Bank 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, and report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your credit worthiness	Yes	Yes
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For nonaffiliates to market to you</b>	Yes	Yes

<b>To limit our sharing</b>	<ul style="list-style-type: none"> <li>▪ Call <b>866-555-1111</b>—our menu will prompt you through your choice(s) <b>or</b></li> <li>▪ Visit us online: <b>www.hb.com</b></li> </ul> <p><b>Please note:</b> If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. If you are <i>no longer</i> 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.</p>
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<b>Questions?</b>	Call 866-555-1212 or go to <a href="http://www.hb.com">www.hb.com</a>
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## Who we are

<b>Who is providing this notice?</b>	Helene Bank, Calypso Insurance, and Atlas Mortgage
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## What we do

<b>How does Helene Bank protect my personal information?</b>	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.
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<b>How does Helene Bank collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>▪ open an account or deposit money</li> <li>▪ pay your bills or apply for a loan</li> <li>▪ use your credit or debit card</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
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<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>▪ sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>▪ affiliates from using your information to market to you</li> <li>▪ sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
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<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices will apply to everyone on your account—unless you tell us otherwise.
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## Definitions

<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>Our affiliates include companies with a Helene name; financial companies, such as Calypso Insurance and Atlas Mortgage; and nonfinancial companies, such as Titan Marketing Agency.</i></li> </ul>
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<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>Nonaffiliates we share with can include mortgage companies, insurance companies, direct marketing companies, and nonprofit organizations.</i></li> </ul>
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<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>▪ <i>Our joint marketing partners include credit card companies.</i></li> </ul>
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## Other important information

Vermont law places additional limits on sharing information. We will not share personal information about Vermont residents with companies that are not affiliated with Helene Bank except for our everyday business purposes or where we have joint marketing agreements.

# FACTS

## WHAT DOES HELENE BANK DO WITH YOUR PERSONAL INFORMATION?

<b>Why?</b>	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.
<b>What?</b>	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> <li>▪ Social Security number and income</li> <li>▪ account balances and payment history</li> <li>▪ credit history and credit scores</li> </ul>
<b>How?</b>	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 Helene Bank chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Helene Bank 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, and report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your credit worthiness	Yes	Yes
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For nonaffiliates to market to you</b>	Yes	Yes

<b>To limit our sharing</b>	<ul style="list-style-type: none"> <li>▪ Call 866-555-1111—our menu will prompt you through your choice(s) <b>or</b></li> <li>▪ Visit us online: <a href="http://www.hb.com">www.hb.com</a> <b>or</b></li> <li>▪ Mail the form below</li> </ul> <p><b>Please note:</b> If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. If you are <i>no longer</i> 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.</p>
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<b>Questions?</b>	Call 866-555-1212 or go to <a href="http://www.hb.com">www.hb.com</a>
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Mail-in Form								
<p>If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.</p> <p><input type="checkbox"/> Apply my choices only to me</p>	<p><b>Mark any/all you want to limit:</b></p> <p><input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes.</p> <p><input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.</p> <p><input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.</p>	<p><b>Mail to:</b></p> <p>Helene Bank 123 Main Street Suite 1 Cityville, MD 20000</p>						
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="background-color: #cccccc; width: 25%;"><b>Name</b></td> <td style="width: 75%;"></td> </tr> <tr> <td style="background-color: #cccccc;"><b>Address</b></td> <td></td> </tr> <tr> <td style="background-color: #cccccc;"><b>Account #</b></td> <td></td> </tr> </table>	<b>Name</b>		<b>Address</b>		<b>Account #</b>		
<b>Name</b>								
<b>Address</b>								
<b>Account #</b>								

## Who we are

<b>Who is providing this notice?</b>	Helene Bank, Calypso Insurance, and Atlas Mortgage
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## What we do

<b>How does Helene Bank protect my personal information?</b>	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.
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<b>How does Helene Bank collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>▪ open an account or deposit money</li> <li>▪ pay your bills or apply for a loan</li> <li>▪ use your credit or debit card</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
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<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>▪ sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>▪ affiliates from using your information to market to you</li> <li>▪ sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
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<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices will apply to everyone on your account—unless you tell us otherwise.
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## Definitions

<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>Our affiliates include companies with a Helene name; financial companies, such as Calypso Insurance and Atlas Mortgage; and nonfinancial companies, such as Titan Marketing Agency.</i></li> </ul>
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<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>Nonaffiliates we share with can include mortgage companies, insurance companies, direct marketing companies, and nonprofit organizations.</i></li> </ul>
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<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>▪ <i>Our joint marketing partners include credit card companies.</i></li> </ul>
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## Other important information

Vermont law places additional limits on sharing information. We will not share personal information about Vermont residents with companies that are not affiliated with Helene Bank except for our everyday business purposes or where we have joint marketing agreements.



# FACTS

## WHAT DOES HELENE BANK DO WITH YOUR PERSONAL INFORMATION?

<b>Why?</b>	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.
<b>What?</b>	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> <li>▪ Social Security number and income</li> <li>▪ account balances and payment history</li> <li>▪ credit history and credit scores</li> </ul>
<b>How?</b>	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 Helene Bank chooses to share; and whether you can limit this sharing.
<b>When?</b>	If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share information about you as described in this notice.  However, you can contact us at any time to limit our sharing.

Reasons we can share your personal information	Does Helene Bank 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, and report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your credit worthiness	Yes	Yes (call 866-555-1111 or visit <a href="http://www.hb.com">www.hb.com</a> )
<b>For our affiliates to market to you</b>	Yes	Yes (call 866-555-1111 or visit <a href="http://www.hb.com">www.hb.com</a> )
<b>For nonaffiliates to market to you</b>	Yes	Yes (call 866-555-1111 or visit <a href="http://www.hb.com">www.hb.com</a> )

<b>Questions?</b>	Call 866-555-1212 or go to <a href="http://www.hb.com">www.hb.com</a>
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## Who we are

<b>Who is providing this notice?</b>	Helene Bank, Calypso Insurance, and Atlas Mortgage
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## What we do

<b>How does Helene Bank protect my personal information?</b>	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.
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<b>How does Helene Bank collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>▪ open an account or deposit money</li> <li>▪ pay your bills or apply for a loan</li> <li>▪ use your credit or debit card</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
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<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>▪ sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>▪ affiliates from using your information to market to you</li> <li>▪ sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
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<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices will apply to everyone on your account—unless you tell us otherwise.
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## Definitions

<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>Our affiliates include companies with a Helene name; financial companies, such as Calypso Insurance and Atlas Mortgage; and nonfinancial companies, such as Titan Marketing Agency.</i></li> </ul>
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<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>Nonaffiliates we share with can include mortgage companies, insurance companies, direct marketing companies, and nonprofit organizations.</i></li> </ul>
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<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>▪ <i>Our joint marketing partners include credit card companies.</i></li> </ul>
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## Other important information

Vermont law places additional limits on sharing information. We will not share personal information about Vermont residents with companies that are not affiliated with Helene Bank except for our everyday business purposes or where we have joint marketing agreements.

# FACTS

## WHAT DOES HELENE BANK DO WITH YOUR PERSONAL INFORMATION?

<b>Why?</b>	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.
<b>What?</b>	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> <li>▪ Social Security number and income</li> <li>▪ account balances and payment history</li> <li>▪ credit history and credit scores</li> </ul>
<b>How?</b>	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 Helene Bank chooses to share; and whether you can limit this sharing.
<b>When?</b>	If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share information about you as described in this notice.  However, you can contact us at any time to limit our sharing.

Reasons we can share your personal information	Does Helene Bank 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, and report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your credit worthiness	Yes	Yes <i>(call 866-555-1111, visit www.hb.com, or mail the form below)</i>
<b>For our affiliates to market to you</b>	Yes	Yes <i>(call 866-555-1111, visit www.hb.com, or mail the form below)</i>
<b>For nonaffiliates to market to you</b>	Yes	Yes <i>(call 866-555-1111, visit www.hb.com, or mail the form below)</i>

<b>Questions?</b>	Call 866-555-1212 or go to <a href="http://www.hb.com">www.hb.com</a>
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### Mail-in Form

<p>If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.</p> <p><input type="checkbox"/> Apply my choices only to me</p>	<p><b>Mark any/all you want to limit:</b></p> <p><input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes.</p> <p><input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.</p> <p><input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.</p>	
	<b>Name</b>	
	<b>Address</b>	
	<b>Account #</b>	
		<p><b>Mail to:</b></p> <p>Helene Bank 123 Main Street Suite 1 Cityville, MD 20000</p>



## Who we are

### Who is providing this notice?

Helene Bank, Calypso Insurance, and Atlas Mortgage

## What we do

### How does Helene Bank 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.

### How does Helene Bank collect my personal information?

We collect your personal information, for example, when you

- open an account or deposit money
- pay your bills or apply for a loan
- use your credit or debit card

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—unless you tell us otherwise.

## Definitions

### Affiliates

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

- *Our affiliates include companies with a Helene name; financial companies, such as Calypso Insurance and Atlas Mortgage; and nonfinancial companies, such as Titan Marketing Agency.*

### Nonaffiliates

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

- *Nonaffiliates we share with can include mortgage companies, insurance companies, direct marketing companies, and nonprofit organizations.*

### Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- *Our joint marketing partners include credit card companies.*

## Other important information

Vermont law places additional limits on sharing information. We will not share personal information about Vermont residents with companies that are not affiliated with Helene Bank except for our everyday business purposes or where we have joint marketing agreements.



## Appendix E—Final Notices

- Letter Notice
- Legal Notice

# FACTS

## WHAT DOES [NAME OF FINANCIAL INSTITUTION] DO WITH YOUR PERSONAL INFORMATION?

<b>Why?</b>	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.
<b>What?</b>	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>■ Social Security number and [income]</li> <li>■ [account balances] and [payment history]</li> <li>■ [credit history] and [credit scores]</li> </ul>
<b>How?</b>	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 [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?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, and report to credit bureaus		
<b>For our marketing purposes—</b> to offer our products and services to you		
<b>For joint marketing with other financial companies</b>		
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences		
<b>For our affiliates' everyday business purposes—</b> information about your credit worthiness		
<b>For our affiliates to market to you</b>		
<b>For nonaffiliates to market to you</b>		

<b>To limit our sharing</b>	<ul style="list-style-type: none"> <li>■ Call [phone number]—our menu will prompt you through your choice(s) <b>or</b></li> <li>■ Visit us online: [website]</li> </ul> <p><b>Please note:</b></p> <p>If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. If you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
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<b>Questions?</b>	Call [phone number] or go to [website]
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## Who we are

Who is providing this notice?

[insert]

## What we do

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 include computer safeguards and secured files and buildings.

[insert]

How does [name of financial institution] collect my personal information?

We collect your personal information, for example, when you

- [open an account] or [deposit money]
- [pay your bills] or [apply for a loan]
- [use your credit or debit card]

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—unless you tell us otherwise.

## Definitions

**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 information]

## Other important information

[insert other important information]

# FACTS

## WHAT DOES [NAME OF FINANCIAL INSTITUTION] DO WITH YOUR PERSONAL INFORMATION?

<b>Why?</b>	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.
<b>What?</b>	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>■ Social Security number and [income]</li> <li>■ [account balances] and [payment history]</li> <li>■ [credit history] and [credit scores]</li> </ul>
<b>How?</b>	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 [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?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, and report to credit bureaus		
<b>For our marketing purposes—</b> to offer our products and services to you		
<b>For joint marketing with other financial companies</b>		
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences		
<b>For our affiliates' everyday business purposes—</b> information about your credit worthiness		
<b>For our affiliates to market to you</b>		
<b>For nonaffiliates to market to you</b>		

<b>To limit our sharing</b>	<ul style="list-style-type: none"> <li>■ Call [phone number]—our menu will prompt you through your choice(s)</li> <li>■ Visit us online: [website] or</li> <li>■ Mail the <b>form</b> below</li> </ul> <p><b>Please note:</b></p> <p>If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. If you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
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<b>Questions?</b>	Call [phone number] or go to [website]
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Mail-in Form		
<p>If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.</p> <p><input type="checkbox"/> Apply my choices only to me</p>	<p>Mark any/all you want to limit:</p> <p><input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes.</p> <p><input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.</p> <p><input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.</p>	
	Name	<p><b>Mail to:</b></p> <p>[Name of Financial Institution]</p> <p>[Address1]</p> <p>[Address2]</p> <p>[City], [ST] [ZIP]</p>
	Address	
	City, State, Zip	
	[Account #]	

## Who we are

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## Other important information

[insert other important information]

