



YOUR PRIVACY IS IMPORTANT TO US

You provide important information about yourself to a variety of businesses and organizations. The same is true when you do business with our financial institution. You're asked to provide us with certain personal information that helps us give you better service and complete your transactions more effectively.

We work diligently to safeguard the information you give to us. In fact, we developed the following policies to ensure you confidentiality and maintain your confidence in our institution. These policies detail the strict standards we have in place. For this reason we ask that you please read the following information carefully.

NOTICE OF YOUR FINANCIAL PRIVACY RIGHTS

We, our, and us, when used in this notice, mean Turnberry Bank.

This is our privacy notice for our customers. When we use the words "you" and "your" we mean the following types of customers:

- Our consumer customers who have a continuing relationship by purchasing or holding financial products or services such as a(n):
 - Deposit account
 - Loan account
 - Safe deposit box
 - Retail installment contract we hold and service
 - Individual Retirement Account

We will tell you the sources of the information we collect about you. We will tell you what measures we take to secure that information. We will tell you what information we share about you with other entities. We will explain what your rights are, and how you can exercise them. If you share an account relationship with someone else, such as a joint account holder or co-borrower, we suggest that you share this information with such persons to ensure that each of you is aware of our policy and your options.

We first define some terms.

Nonpublic personal information means information about you that we collect in connection with providing a financial product or service to you. Nonpublic personal information does not include information that is available from public sources, such as telephone directories or government records. Hereafter, we will use the term "*information*" to mean nonpublic personal information as defined in this section.

An **affiliate** is a company we own or control, a company that owns or controls us, or a company that is owned or controlled by the same company or person that owns or controls us. Ownership does not mean complete ownership, but means owning enough to have control.

A **nonaffiliated third party** is a person we do not employ or a company that is not an affiliate of ours. This is also known as nonaffiliated third party, or simply, an "*other party*."

Opt out means a choice you can make to prevent certain sharing of information. We will explain how you can exercise this choice.

THE INFORMATION WE COLLECT

We collect information about you from the following sources:

- Information you give us on applications or other forms
- Information about your transactions with us
- Information about your transactions with our affiliates
- Information about your transactions with other parties
- Information from a consumer reporting agency
- Information we receive as a result of verifying customer information

THE CONFIDENTIALITY, SECURITY, AND INTEGRITY OF YOUR INFORMATION

We restrict access to information about you to those employees who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards to protect this information.

YOUR INFORMATION AND OUR AFFILIATES

We may disclose information about you to our affiliates. Here are the kinds of information and the source of that information:

Transaction and experience information from our account records:

- Name
- Address
- Account balances
- Account activity
- Types of accounts
- Parties to the transaction
- Credit card usage
- Payment history
- Deposit history
- Transaction history

Federal law allows us to disclose the information listed above with our affiliates. You do not have a right to opt out of the disclosure of this information.

Other information not taken from transactions and experience:

- Name
- Address



- Social Security Number
- Assets
- Income
- Age
- Beneficiaries
- Information we receive from a credit reporting agency, such as:
 - Creditworthiness
 - Credit history
 - Checking account management

You may opt out of the disclosure of the information listed above.

Types Of Affiliates

Currently, the only affiliate of ours to which we share information with is Young, Stovall & Company, a securities broker-dealer. Your information is protected from disclosure to any third party by a confidentiality agreement as well as policies and procedures jointly adopted by us and Young, Stovall & Company.

Reasons For Disclosure

We may disclose information about you to our affiliates:

- to provide you with information about additional products and services.
- to evaluate our total relationship with you and our family of companies and give you the best price that relationship deserves.
- to allow you to share with us the individual pieces of your overall financial plan.

YOUR INFORMATION AND OTHER PARTIES

We will not disclose information about you to anyone except as disclosed in this policy or as permitted by law. Examples of this might include disclosures necessary to service your account or prevent unauthorized transactions.

INFORMATION ABOUT FORMER CUSTOMERS

We do not disclose information about former customers, except as permitted by law.

AUTHORIZED SHARING - JOINT MARKETING

We may disclose the following information to other financial institutions with whom we have joint marketing agreements:

- Information you give us on an application or other forms, such as:
 - Name
 - Address
 - Phone number

We disclose the information listed above with other financial institutions with whom we have joint marketing agreements. You do not have a right to opt out of the disclosure of this information.

State Limitations

AL, AK, CA, ID and VT - We will not share this information about customers who reside in Alabama, Alaska, California, Idaho or Vermont.
MA, MS and NJ - We will not share any information derived from deposit relationships with us about customers who reside in Massachusetts, Mississippi or New Jersey.

IL - We will not share this information about our customers who reside in Illinois with other parties.

Types of Businesses

We may disclose information pursuant to joint marketing agreements to the following types of businesses:

- Financial service providers, such as:
 - Merchant service provider

Reasons For Disclosing

We may disclose information about you to other financial institutions with whom we have joint marketing agreements to provide you with information about additional products and services.

YOUR RIGHT TO BLOCK THE DISCLOSURE OF YOUR INFORMATION

Affiliates. We are permitted to disclose information about our transactions or experiences with you to affiliates. You do not have the right to opt out of the disclosure of this particular type of information. We may also disclose *other* information to our affiliates (that is, information beyond our transactions and experiences with you), unless you tell us to not disclose this *other* information.

Your decision to block the disclosure of your information will apply to information collected from all products and services you receive from us. Remember, though, that your opt out will not apply to information we share that is related to your actual transaction and experience with one of us, which we make available to our affiliates.

If you have obtained one or more products or services jointly, an opt out instruction by any party will be effective for all of that party's information we have collected and for all information collected in conjunction with the product or service for all other joint parties. If one of you chooses to opt out, no information we have collected about you will be shared, nor will we share information about any other joint party collected in conjunction with the product or service.

If you previously sent us an opt out form, unfortunately we **cannot** continue to apply your instructions because our privacy policy has changed. If you choose to opt out, you must return the opt out form as provided herein.

If you wish to opt out of the disclosure of your information, you may do so by returning the completed opt out form to us at this address:

Turnberry Bank
Attn: Operations Department
20295 NE 29th Place
Aventura, FL 33180



YOU HAVE THE RIGHT TO CHOOSE

In this notice, we have explained our policy about the disclosure of certain information.

Affiliates. We have explained the kinds of information we may disclose to our affiliates. We have also explained the kinds of affiliates with whom we may disclose the information. If you prefer that we do not disclose information to our affiliates you may opt out of those disclosures, that is, you may direct us not to make those disclosures (other than the disclosures permitted by law).

Your decision to block the disclosure of your information will apply to information collected from all products and services you receive from us. Remember, though, that your opt out will not apply to information we share that is related to your actual transaction and experience with one of us, which we make available to our affiliates.

If you have obtained one or more products or services jointly, an opt out instruction by any party will be effective for all of that party's information we have collected and for all information collected in conjunction with the product or service for all other joint parties. If one of you chooses to opt out, no information we have collected about you will be shared, nor will we share information about any other joint party collected in conjunction with the product or service.

If you previously sent us an opt out form, unfortunately we **cannot** continue to apply your instructions because our privacy policy has changed. If you choose to opt out, you must return the opt out form as provided herein.

If you wish to opt out of the disclosure of your information, you may do so by completing the opt out form on the reverse side and returning this form to us at this address:

Turnberry Bank
Attn: Operations Department
20295 NE 29th Place
Aventura, FL 33180

Please accept this form as my request to not share my information, other than information relating to your transactions and experiences with me, with your affiliates.

OPT OUT FORM

If you wish to opt out of the disclosure of your information you may do so by completing the required information, sign and return this form to us at this address:

Turnberry Bank
Attn: Operations Department
20295 NE 29th Place, Aventura, FL 33180

Name			
Address	City	State	Zip
Account Numbers			
Signature			